

Preliminary General Plan/Final Environmental Impact Report Sinkyone Wilderness State Park



View of rugged landscape from Bear Harbor, Source: EDAW 2003

Response to Comments

State Clearinghouse #2003022115

**California Department of Parks and Recreation
September 2006**



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1 INTRODUCTION

On June 23, 2006 the California Department of Parks and Recreation (Department) released to the general public and public agencies the Preliminary General Plan/Draft Environmental Impact Report for Sinkyone Wilderness State Park (Park). The proposed General Plan will guide future management direction at the Park. It contains a comprehensive and integrated set of parkwide goals and guidelines for the long-term management of the Park that focus on protection of environmental resources, enhancements to visitor use and opportunities, and improvements to administration and operations of the Park. In addition, the General Plan includes proposed park development and designates appropriate land uses.

The Draft Environmental Impact Report (EIR) that is included in the Preliminary General Plan contains the environmental analysis of potentially significant effects of the proposed project. Together, the Draft EIR and this response to comments document constitute the Final Environmental Impact Report for the project.

In accordance with Public Resources Code Section 21091 and CEQA Guidelines Section 15087, a 45-day public review period for the Draft EIR was provided. The public was advised of the availability of the Preliminary General Plan/Draft EIR through public notices and notification on the Department's web site. The public notice (Notice of Availability) was posted with the Mendocino County Clerk and Humboldt County Clerk. Copies of the Preliminary General Plan/Draft EIR were also available for review at the following locations: Humboldt County Library (Main Branch, Rio Dell Branch, Fortuna Branch, Garberville Branch), Mendocino County Library (Ukiah Branch, Fort Bragg Branch), Leggett Post Office, Sinkyone Wilderness State Park/Needle Rock Visitor Center, Richardson Grove Interpretive Association Ranger Office, Standish-Hickey State Recreation Area, Humboldt Redwoods Interpretive Association Visitor Center, California State Parks Northern Service Center, and on the State Parks web site.

The public review period ended August 7, 2006. During the public review period comments on the plan and the environmental issues evaluated in the Draft EIR were received from agencies, organizations, and individuals. This document provides responses to written comments received during the 45-day public review period.

The focus of the response to comments is on the disposition of environmental issues that have been raised in the comments, as specified by CEQA Guidelines Section 15088(b), but also includes responses related to planning considerations of the Preliminary General Plan.

All comments on the Preliminary General Plan/Draft EIR and the responses thereto, are presented in this document, which is organized as follows:

- **Chapter 1** (Introduction) provides a brief overview of the proposed project, describes the requirements under CEQA for responding to the public comments received on the Draft EIR, and describes the organization of the Final EIR.
- **Chapter 2** (List of Commenters) provides a list, in table format, of all written comments received on the Preliminary General Plan/Draft EIR during the public comment period.
- **Chapter 3** (Comments and Responses) provides a complete copy of, and responses to, written comments on the Preliminary General Plan/Draft EIR received during the public review and comment period.
- **Chapter 4** (Recommended Changes to the General Plan) provides a reproduction of portions of the Preliminary General Plan/Draft EIR with proposed revisions to text made in response to comments.

2 LIST OF COMMENTERS

This chapter provides a list of all public comments received on the Preliminary General Plan/Draft EIR during the public review period. Table 2-1 indicates the commenter/organization that prepared written comments and the date the comment(s) were postmarked and received.

Table 2-1: List of Written Comments Received

Letter Number	Commenter	Agency/ Organization/ Individual Represented	Date Postmarked	Date Received
1	John Feliz		June 27, 2006	June 29, 2006
1.1	Mark A. Wasser	Kronick, Moskovitz, Tiedemann & Girard/ John Feliz	Hand Delivered	August 4, 2006
2	Richard Gienger		August 7, 2006	August 9, 2006
3	Richard Gienger		August 7, 2006	August 9, 2006
3.1	Richard Gienger		E-mail	August 14, 2006
4	Ryan Henson	California Wilderness Coalition	E-mail	August 8, 2006
5	Michael D. Rydjord		August 7, 2006	August 8, 2006
6	Hawk Rosales	InterTribal Sinkyone Wilderness Council	August 7, 2006	August 9, 2006
7	Megan Aiyana Gregori		August 8, 2006	August 10, 2006
8	Jeanette Pedersen	Department of Forestry and Fire Protection	Received by SCH on August 10, 2006	August 14, 2006
9	Carole Polasek	Redwood Unit, Back Country Horsemen of California	August 7, 2006	August 9, 2006
10	Lynda Roush	U.S. Department of the Interior, Bureau of Land Management	August 15, 2006	August 18, 2006

3 COMMENTS AND RESPONSES

This chapter provides a complete copy of the written comments received on the Preliminary General Plan/Draft Environmental Impact Report for Sinkyone Wilderness State Park, and presents responses to significant environmental issues raised in the comments, as required by CEQA Guidelines Section 15132, as well as comments pertaining to the Preliminary General Plan.

Each letter is reproduced in its entirety, including attachments. Each letter and comments correspond to Table 2-1. The responses to comments follow each letter. Revisions to text in the General Plan/EIR are shown with a strikethrough or underline. Text that has a ~~strikethrough~~ has been deleted from the General Plan/EIR. Text that has been added is presented as single underlined.



Arnold Schwarzenegger
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Sean Walsh
Director

August 8, 2006

Dave Keck
Department of Parks and Recreation
Northern Service Center
One Capitol Mall, Suite 500
Sacramento, CA 95814

Subject: Sinkyone Wilderness SP Preliminary General Plan/Draft EIR
SCH#: 2003022115

Dear Dave Keck:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on August 7, 2006, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts
Director, State Clearinghouse

**Document Details Report
State Clearinghouse Data Base**

SCH# 2003022115
Project Title Sinkyone Wilderness SP Preliminary General Plan/Draft EIR
Lead Agency Parks and Recreation, Department of

Type EIR Draft EIR
Description The project consists of the proposed approval of a General Plan for Sinkyone Wilderness State Park. The General Plan will guide future management direction at the Park over an approximate 20-year planning horizon. Upon approval of the Plan, large portions of the Park (approximately 7,100 acres) will be designated as state wilderness.

Lead Agency Contact

Name Dave Keck
Agency Department of Parks and Recreation
Phone (916) 445-8903 **Fax**
email
Address Northern Service Center
One Capitol Mall, Suite 500
City Sacramento **State** CA **Zip** 95814

Project Location

County Humboldt, Mendocino
City
Region
Cross Streets Usal and Briceland County Roads north of Hwy. 1 and the intersection of Hwy. 101
Parcel No.

Township	Range	Section	Base
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Proximity to:

Highways
Airports
Railways
Waterways Usal Creek, Whale Gulch Creek, Anderson Creek, Dark Creek, Jackass Creek, Bear Harbor Creek
Schools
Land Use Parks and Recreation - California State Parks

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Cumulative Effects; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Landuse; Noise; Public Services; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Wildlife

Reviewing Agencies Resources Agency; Regional Water Quality Control Board, Region 1; Native American Heritage Commission; Office of Historic Preservation; Department of Health Services; Department of Forestry and Fire Protection; Department of Fish and Game, Region 3; Department of Fish and Game, Region 1; Department of Water Resources; California Coastal Commission; California Highway Patrol; Caltrans, District 1; Air Resources Board, Transportation Projects; Department of Toxic Substances Control

Date Received 06/23/2006 **Start of Review** 06/23/2006 **End of Review** 08/07/2006

Jnue 27 20067

RECEIVED

Letter 1

JUN 29 2006

NORTHERN SERVICE CENTER

certified mail

California Department of Parks & Recreation
Northern Service Center
One Capitol Mall, Suite 500
Sacramento California 95814
Attention: Dave Keck

Re: 052-240-03 21.63 Ac Lots 2 & 3, Sec 25 24x19 WM
Reserving Rights for Relief from Taking of Access Road and Other
Acts Immicible to Full Use and Enjoyment of the Above Captioned Land.

Dear Mr Keck,

Thank you for the mailing of the Report of Sinkyone Wilderness State Park
new Plan and Draft received here June 23, 2006.

Those records apparently omit my private ownership located at the mouth of
Duffy Creek watershed and the shoreline, including standing timber. Is
there a reason why the full and detailed report does n't show this?

My access road out to the property from 4 corners (site) County Road was
built by Sid Green, logging the area in 1957. The road was maintained and
widened and culverted as an open fire control road for a long time
afterwards, and since 1964 was my access to the parcel.

My concern is that it has been or will be is removed by grading it out in
keeping with the wilderness approach to value.

With these facts offered for your consideration,. Can you offer any
assurances to keep access along the Briceland Road into Bear Harbor?
Or A key to the gate would be helpful.

Would you please address what impact the General Plan is expected to
otherwise have or impact on this ownership? As an example, would you
consider:

1A

1B

2. If Roscoe P Barnberry wants to buy this 21.63 acres (1870 Township Survey) bordered by State lands for a certain sum (ocean frontage remember), yet feels some reluctance at the presence of the state plan, would you please write to me to show that this Program of careful management is not in anyway anything but a good neighbor, and that he is welcome to the full use and enjoyment of what the site offers?

1C

This letter is to insure use of the land. Thank you for what help you can give.

Sincerely



John Feliz
6906 NE 139th Street
Vancouver Washington 98686
e-mail: Jfeliz2@earthlink.net

MARK A. WASSER
ALSO ADMITTED IN NEVADA

mwasser@kmtg.com

August 3, 2006

HAND DELIVERED

California State Parks
Northern Service Center
One Capitol Mall, Suite 500
Sacramento, California 95814

Re: **Comment letter on Preliminary General Plan and Draft EIR for Sinkyone
Wilderness State Park**

Dear Sirs:

We represent John Feliz. Mr. Feliz owns 21.63 acres (APN 052-240-03) adjacent to the proposed State Park. We write this letter in comment to the Preliminary General Plan and Draft Environmental Impact Report for the Sinkyone Wilderness State Park.

First, the Draft EIR fails to adequately disclose and analyze the significant adverse environmental impacts of implementing the General Plan.

Second, the General Plan will unlawfully restrict Mr. Feliz' access to his property by closure, removal and damage to his access road. The road was built in 1957 and has been continuously used since then for access. Mr. Feliz has enforceable rights to access. Impairment of Mr. Feliz' continued use of the road for access to his property will violate the state and federal constitutions as well as state law.

Third, the General Plan will impose unlawful restrictions on Mr. Feliz' use of his land and will unconstitutionally depreciate the value of his property.

Please consider and respond to these comments.

Very truly yours,


MARK A. WASSER

MAW/cd
cc: Mr. John Feliz

837100.1

1.1A

1.1B

1.1C

RECEIVED

AUG 04 2006

NORTHERN SERVICE CENTER

Response to Letter 1 - John Feliz

- 1A -** The General Plan maps do not specifically show that this parcel is privately owned. However, you will note that the base maps do not include your property as part of the State Park. At Duffy's Reef, the boundary line moves inland around your parcel. However, we will amend the maps to show your private parcel identified by the County as APN 052-240-03 at the mouth of Duffy Creek. Because this land is not included in the park, it does not have a designation in this General Plan.

You have stated that you have an access road to your property from Four Corners which was built by Sid Green who was logging in the area in 1957. You also stated that this road was maintained as an open fire control road for a long time and that you have used it since 1964 to gain access to your parcel. The Department is not aware of an existing road at this location that would provide access to your parcel. However, Briceland Road does currently extend to Orchard Camp.

It is the Department's intent that the existing management that keeps the Briceland Road (a county road) to Railroad Camp open in the non-rainy season will stay the same. You and members of the public may use the Briceland Road, extending to Orchard Camp whenever it is open.

The placement and use of all park roads and trails will be subject to more detailed planning and analysis as part of a future Roads and Trails Management Plan. On page 3-27 of the Preliminary General Plan, a goal statement and related guidelines are provided for roads and trails, as indicated below:

Goal RT-1: Manage and maintain public and administrative access to the Park and its periphery through a system of sustainable roads and trails that is consistent with protecting Park resources and maintaining state wilderness values. Develop a comprehensive road and trails management plan.

Guideline RT-1C: Evaluate the Park's entire roads and trails system and prepare a Roads and Trails Management Plan with guidelines for the management of existing roads and trails. This management plan should guide the placement and use of any future roads, trails, and trail camps. Work with Mendocino County to evaluate options to transfer ownership of Briceland Road from Four Corners to Bear Harbor to State Parks.

- 1B -** The Department does not anticipate negative environmental impacts to your property as a result of implementing the General Plan.

- 1C -** The Sinkyone Wilderness State Park General Plan does not address any use or enjoyment that you may obtain for your property. The use and enjoyment of that property is regulated by other state and local government laws, including but not limited to Mendocino County and the California Coastal Commission.

Response to Letter 1.1 – Mark A. Wasser/ Kronick, Moskovitz, Tiedemann & Girard (representing John Feliz)

- 1.1A** - The Department has followed the CEQA Guidelines to develop the Draft EIR in order to disclose and analyze any significant adverse environmental impacts resulting from implementing the General Plan. Your comment regarding the failure to disclose and analyze significant impacts cannot be adequately addressed because you have failed to provide any specific details for our response. The environmental analysis is programmatic in scope and does not contain project-specific analysis, as discussed on page ES-3 and Section 4.3.1 of the Preliminary General Plan/Draft EIR.
- 1.1B** - The General Plan does not state that Briceland Road, which appears to be the road Mr. Feliz is referring to in his letter dated 6/27/06, will be closed, removed, or damaged. Please see response 1A regarding access issues.
- 1.1C** - You have not identified any specific restrictions the general plan has placed on Mr. Feliz's property; therefore, we cannot specifically address this concern. Please see response 1C regarding property restrictions or possible uses of the property.

Letter 2

Richard Gienger
Box 283, Whitethorn
<rgrocks@humboldt.net>
California 95589
707-923-2931
Fax: 923-4210
7 August 2006

California State Parks
Northern Service Center
Atten: Dave Keck
<dkeck@parks.ca.gov>
One Capitol Mall, Suite 500
Sacramento, CA 95814

Dear Dave Keck & other Parks' officials:

I will be trying to get comments off to you today, for me and also on behalf of the Environmental Protection Information Center (EPIC). They will be incomplete given the circumstances described below. This letter is asking for a reasonable, say 30-day, extension for public comment. The Notice of Availability was dated the 23rd of June with a deadline for comment of August 7th.

Although the Sinkyone Wilderness Coast has been a long-time high priority for me, other obligations limited the time I could really focus on the planning/analysis documents. I had a chance to briefly look at a hardcopy in the library and to skim through various sections during July. Library hours are limited and requests for a hard copy for me and/or EPIC were not successful. The limits on my computer prevent examination or printing of the maps. I have been able to slowly print sections incrementally,

It wasn't until the beginning of last week that I was able to begin a page-by-page examination of the "Preliminary General Plan/Draft Environmental Impact Report" for Sinkyone Wilderness State Park. This document is 193 pages. The appendices are a critical part of necessary review and that document is 185 pages.

Given the immensity of detail (over 130 Goals or Guidelines), the years taken to finally come up with a draft Plan & EIR (specific Plan legislation was in 1980), and the importance now and in the future of Sinkyone Wilderness -- a request for a thirty-day extension is quite modest. Please grant the request for an extension. Also, please permit e-mail filing for comments.

Sincerely,

Richard Gienger

2A

Response to Letter 2 – Richard Gienger

- 2A -** An extension of the review and comment period on the Sinkyone Preliminary General Plan/Draft EIR was denied because an extended review period would have made it extremely difficult to schedule the State Park and Recreation Commission hearing this year in Northern California for consideration and adoption of the Sinkyone Wilderness SP General Plan. The Department has complied with the CEQA requirements for public review and comment. The 45-day comment period began on June 23rd and ended August 7, 2006. Copies of the Preliminary General Plan/Draft EIR were made available for review in several locations in Humboldt and Mendocino counties, as well as in Sacramento and from the State Parks Internet web page. The Department has considered all the comments received, and has provided responses to the pertinent CEQA-related issues in finalizing the EIR.

Letter 3

Richard Gienger
Box 283, Whitethorn
<rgrocks@humboldt.net>
California 95589
707-923-2931
Fax: 923-4210
7 August 2006

California State Parks
Northern Service Center
Atten: Dave Keck
<dkeck@parks.ca.gov>
One Capitol Mall, Suite 500
Sacramento, CA 95814

RE: SWSP Preliminary GP & Draft EIR

Dear Dave Keck & other Parks' officials:

While the Sinkyone Wilderness State Park Preliminary General Plan & Draft Environmental Impacts are generally well written and cover extensive amounts of details, analysis, goals, and guidelines -- there are notable deficiencies and omissions. In several places cooperation with stakeholders et al. is mentioned, for instance in reference to "open communication on important issues" on pdf page 116 of the Preliminary GP, while there is no provision for a permanent and effective 'citizen' advisory group that would actually assure open communication and timely action on important issues. Such a process needs to be included and emphasized.

3A

An example of an important issue is coping with fire hazard reduction. Several places acknowledge and seemingly respond to the issue, for instance stating that a Wildfire Management Plan will be undertaken. Without an advisory group to press the issue and to seek funds for implementation, it is unlikely that the Wildfire Management Plan will come forth anytime soon. The General Plan process itself has been in the offing for over 25 years.

The Preliminary General Plan basically ignores or downplays important legislative provisions. Such response applies to the provisions and issues from Public Resources Code (PRC) 5002.45 relating to nonmotorized transportation for the elderly and disabled, as well as sportfishing and hunting. PRC Section 5093.36 of the California Wilderness Act requires that there be "no permanent road within any wilderness area". While I advocate wilderness for the Sinkyone Wilderness as well as access on the Needle Rock Road as long as nature provides it -- it seems technically incorrect to designate "wilderness" west of the Needle

3B

Letter 3

Rock Road unless the area west is included as part of the Chemise Mountain Wilderness Area.

Again, as regards the issue of fire, PRC Section 5093.34 allows measures to "be taken as may be necessary for control of fire . . . and diseases." The General Plan and EIR should contain some basic implementable actions for fire risk reductions prior to preparation of a hypothetical Wildfire Management Plan. These actions could and should be incorporated with appropriate cultural resource protection and restoration. Because I have not been able to finish a complete page-by-page response I can't say for sure that 'Sudden Oak Death' has been sufficiently dealt with, but judging from the fire and vegetation issues I suspect it has not.

3C

3D

There also need to be more specific descriptions of the 'spatial' vision of Sinkyone Wilderness, from lot line adjustments along the Usal Road to specific desired connectivity to various areas.

3E

These are basically preliminary comments to the Preliminary General Plan and Draft EIR and are written by me and are also on the behalf of the Environmental Information Protection Center (EPIC). Please extend the comment period for 30 days and allow comments to be e-mailed as requested earlier today.

3F

Sincerely,

Richard Gienger

Response to Letter 3 – Richard Gienger

- 3A -** Input from the community is always valued and given careful consideration. The Department of Parks and Recreation has adopted a tiered planning approach that will provide additional opportunities for public participation as specific management plans, such as vegetation and wildfire management, are developed. The North Coast Redwoods District staff recognizes that the development and implementation of the vegetation and wildfire management plans are a high priority upon adoption of the General Plan and will solicit public input. However, we believe we can solicit input and communicate with the community without having to establish a formal Citizens Advisory Committee. General plans do not guarantee funding for the purpose of plan implementation.
- 3B -** In the Sinkyone Wilderness preferred alternative, Briceland Road (Needle Rock Road), transits the northern portion of the Wilderness and provides alternate recreation opportunities within the park. Vehicle access to Needle Rock via Briceland Road is consistent with past practices, and should especially benefit elderly and disabled visitors. Although traversing a designated wilderness area, the lands on either side of this county road will be managed consistent with the values of the State Park Wilderness classification. The road itself is not part of the designated State Wilderness. It is the Department's common practice to exclude roadways from wilderness areas.

The Department envisions that universal accessibility be integrated into the Department's culture and embodied in its programs, providing visitors, regardless of their abilities, with high-quality recreational opportunities while preserving the integrity of the park's resources. The following guideline additions will be included in the final general plan:

Guideline RT-1C: Evaluate the Park's entire roads and trails system and prepare a Roads and Trails Management Plan with guidelines for the management of existing roads and trails. This management plan should guide the placement and use of any future roads, trails, and trail camps, and evaluate opportunities for non-motorized transportation for the elderly and disabled persons. Work with Mendocino County to evaluate options to transfer ownership of Briceland Road from Four Corners to Bear Harbor to State Parks.

Guideline RT – 1F: Provide universal access to all park facilities, such as buildings, trails, campsites, and picnic sites and their contents, parking, and routes of travel where feasible (see reference to accessibility guidelines in section 2.2, Planning Influences).

- 3C -** As previously indicated, within the Department of Parks and Recreation, the General Plan is intended as a guiding document that enables subsequent, more detailed, management plans. Management plans are more specific to a particular plan element, and typically require a more in-depth review well beyond the scope of a General Plan. For example, on page 3-26 of the Preliminary General Plan, the Fire Hazards and Management section stipulates the goal to develop a coordinated fire suppression plan and a prescribed fire management plan. Also see responses to 8F and 8G.
- 3D -** Please see response 8A and 8B regarding sudden oak death.
- 3E -** Future property acquisitions from willing sellers for the purpose of combining several small isolated parcels within the park or obtaining properties that help achieve goals within the General Plan may be considered. Additional discussion is provided in the General Plan on page 2-81 in the Existing Conditions section regarding the Department's opportunities and conditions for potential linkages and coordinating future land management and use.
- 3F -** Please see Response 2A regarding time extensions.

Letter 3.1

Richard Gienger
Box 283, Whitethorn
<rgrocks@humboldt.net>
California 95589
707-923-2931
Fax: 923-4210
14 August 2006

California State Parks
Northern Service Center
Atten: Dave Keck
<dkeck@parks.ca.gov>
One Capitol Mall, Suite 500
Sacramento, CA 95814

RE: SWSP Preliminary GP & Draft EIR
(continued comments 1)

Dear Dave Keck & other Parks' officials:

These are continued comments from August 7th and are based on further examination of the documents related to the Preliminary General Plan and Draft Environmental Impact Report, although I have still not been able to complete full review and am making my way through the Goals and Guidelines. I would like to include some pertinent process comments from my August 11th email to Mr. Dave Keck:

"Isn't it possible to have a portion of the Commission review the draft with the public in November 2006 and then have the modified draft presented to [for] approval to the full Commission in early summer 2007? Among other things, this would give a much better, less weather risky, opportunity for the Commission to visit the area involved in their critical plan decisions.

The Commission was a key factor, venue, and crucial authority in protection of the Sinkyone Wilderness Coast in the '70s and '80s. One would hope that the new 'streamlined' system doesn't compromise important decisions and public participation."

3.1A

I understand that you view the EIR as a programmatic EIR with future plans tiered to it, but I think the level of detail revealed about the Plan is somewhat disingenuous and leaves unresolved until some distant unknown future date critical issues that bear NOW on most of Sinkyone Wilderness State Park being added to the California Wilderness System. I would claim that this approach amounts to future "piecemealing" of approvals of programs and projects that greatly affect SWSP, and will greatly impair the public's ability to respond to the whole project before it now -- which is to add the greater part of SWSP to the California Wilderness System.

3.1B

Letter 3.1

An example: The Wheeler Road is currently a permanent road into the heart of the wilderness area. It goes between the Sally Bell Grove and significant remnant old growth on the adjacent spectacular 'high ground' as well as through the contiguous proposed wilderness area down to the lower Wolf Creek/Jackass Creek area. If it is left to some future road & trails plan, does this mean that the road will be actually taken out? Why isn't the issue dealt with now? It seems that the Wheeler Road and the Georgia-Pacific Haul Road (referred to as the Hotel Gulch Trail on some of the maps) need to be decommissioned with an actual trail retained -- that could perhaps accommodate "quad" emergency vehicles as health & safety warrant it.

3.1B

Another example: The way it is now in the Preliminary General Plan it would appear that the Needle Rock Road would have to be decommissioned. It is a permanent road through a proposed wilderness area. This points up the insufficiency of alternatives considered. One alternative would be all wilderness except west of the Needle Rock Road and a certain area at Usal.

On page 118 of the pdf Preliminary General Plan under "Parkwide Goals and Guidelines" and "Resource Management", it is claimed that "primeval characteristics and natural conditions [will be restored & maintained] in a manner that supports the purpose and values of state wilderness." I hope this means that millennia of California Indian influence on and with the land is considered "primeval" and part of "natural conditions". Restoration as referenced in many places should include restoration of many old growth species, not just Redwood, and include Tan Oak acorn & Chinquapin nut gathering areas, which will be very important for many values including education and reduction of risk from catastrophic fire.

3.1C

These comments are written for me and on the behalf of EPIC.

Sincerely,

Richard Gienger

Response to Letter 3.1 – Richard Gienger

3.1A - Please see Response 2A regarding the review and approval schedule for the Sinkyone Preliminary General Plan/Draft EIR.

3.1B - General plans are required by law prior to the development of a park unit and serve as a programmatic environmental impact report. The Department of Parks and Recreation recognizes the need for general plans having a broader scope with a focus on purpose and direction, so that these guiding documents will be more enduring and adaptable to future changing conditions. While the vision and goals of an adopted general plan remain constant, specific approaches for implementation can adjust with new technology, changing circumstances and visitor needs. Subsequent future management plans (such as a Roads and Trails Management Plan) will be consistent with the goals and guidelines presented in the General Plan and will provide a more comprehensive analysis which is not appropriate at the general plan level. General plans no longer have specified timeframes; they will be reconsidered for amendments or revisions when circumstances and needs dictate.

Specific to roads and trails, the Preliminary General Plan provides the guidance for future planning as follows:

Goal RT-1: Manage and maintain public and administrative access to the Park and its periphery through a system of sustainable road and trails that is consistent with protecting Park resources and maintaining state wilderness values. *Develop a comprehensive road and trails management plan.* [Emphasis added.]

Guideline RT-1C: Evaluate the Park's entire roads and trails system and prepare a Roads and Trails Management Plan with guidelines for the management of existing roads and trails. This management plan should guide the placement and use of any future roads, trails, and trail camps. Work with Mendocino County to evaluate options to transfer ownership of Briceland Road from Four Corners to Bear Harbor to State Parks.

The alternatives presented in the Preliminary General Plan/Draft EIR comply with CEQA Guidelines (Section 15126.6) for alternatives analysis by describing and evaluating a range of reasonable alternatives to the proposed project. The General Plan has presented an evaluation of Alternative 2 – Maximum Wilderness Alternative.

3.1C - It is Department policy to manage for ecological systems as opposed to single species. Natural resource restoration efforts, as guided in this plan,

will include plant composition assessments and the reintroduction of appropriate species.



**CALIFORNIA
WILDERNESS
COALITION**

The Voice for Wild California

August 7, 2006

Letter 4

California State Parks
Northern Service Center
Attention: Dave Keck
One Capitol Mall, Suite 500
Sacramento, CA 95814

Subject: Sinkyone Wilderness State Park Preliminary General Plan and Draft
Environmental Impact Report

Dear Mr. Keck:

Our organization strongly supports the Preferred Alternative as described in the Sinkyone
Wilderness State Park Preliminary General Plan and Draft Environmental Impact Report.

Though we are a wilderness advocacy organization, we agree with the Preliminary
General Plan (PGP) and Draft Environmental Impact Report's (DEIR) conclusion that the
Maximum Wilderness Alternative is rather undesirable. There is no reason why vehicles
should be prevented from reaching the Needle Rock House. The Needle Rock House
provides an important management presence in the north that is often lacking at Usal
Beach in the south, and it serves as an interpretative site and staging area for
recreationists. Limiting vehicle access to the facility would perhaps do more harm than
good. Meanwhile, the No Project and Minimum Wilderness Alternatives are undesirable
because they would fail to protect the Park's superlative natural, recreational and cultural
values and because they would also fail to meet the expressed intent of the California
State Legislature that a significant portion of Sinkyone Wilderness State Park be
designated and managed as a state wilderness.

For over four years now we have been intimately involved in the crafting and
advancement of Representative Mike Thompson's Northern California Coastal Wild
Heritage Wilderness Act that would, among other things, designate over 42,000 acres of
the King Range National Conservation Area (KRNCA) as wilderness, including the
Chemise Mountain portion of the KRNCA which directly abuts Sinkyone. As of today the
bill has passed both the House and Senate and it may be signed into law as early as
September. This federal designation, combined with the Preferred Alternative's laudable
proposal to protect most of Sinkyone Wilderness State Park as wilderness would preserve
the Lost Coast's superlative natural, recreational and cultural values for generations to
come.

Thank you for the opportunity to review the DGP and DEIR and for considering our
comments.

Sincerely,

Ryan Henson
Policy Director
PO Box 993323
Redding, CA 96099
530-245-3087

CENTRAL OFFICE

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NORTH COAST

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DESERT

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4A

Response to Letter 4 – California Wilderness Coalition, Ryan Henson, Policy Director

- 4A** - The Department appreciates your comments and support for the State Wilderness designation, as described in the General Plan's Preferred Alternative.

Letter 5

Michael Rydjord
214 Quietwood Drive
Vacaville, CA 95688
August 6, 2006

RECEIVED

AUG 08 2006

NORTHERN SERVICE CENTER

California State Parks
Northern Service Center
Atten: Dave Keck
One Capitol Mall, Suite 500
Sacramento, CA 95814

Dear Dave Keck, California State Parks:

I wish to comment on the draft of the General Plan for Sinkyone Wilderness State Park. I find the overall scope and vision of the plan to be acceptable; however, there are some areas upon which I would like to comment.

My interest and experience at the park began in 1991 when like many visitors I spent a few nights camping. But from that point I believe it differs significantly from most others. I became very involved in the host program at the Needle Rock house.

I have spent not just a few days in the park but a number of years of my life. I have been there in all seasons and all weather, working and learning. I have come to know many of the people who visit and have talked and interacted with thousands. I have watched many changes and I think most will be pleased with the plan. For the most part it provides the access necessary for the wide variety of visitor interests and meets the requirements for activities at many different levels. It continues the tradition of going to Bear Harbor that dates from over a century ago and sets aside more remote areas. As we have chosen to call the park a "Wilderness" we must continually remember that it is only that because we have decided to put a label on it as such. It is many things to many people and it is important not to forget that as the park is configured for the future it must be done with some respect for its past history and management. It is a wonderful place and is worthy of our efforts to keep it a place for all to enjoy.

The Plan is a very large document and as written it is not very user friendly for review by the public. I had the previous draft at the visitors' center and found that people would quickly lose interest in reading it. The host for July 2006 found the current document not to be a document of much interest and didn't have much public interest in it. So if you get very few comments from the public it isn't because they aren't interested in the park it is probably a result of the Form of the General Plan presentation. I would also like to point out that the vast majority of the visitors to the park have not taken part in the general planning review process nor do they know that it is happening. A select number of

5A

special interest groups and other parties have been very involved and some of their views are contradictory to the vast number of park users.

The plan addresses the formation of wilderness area but shows very little vision in how the area will be managed except to exclude the use of machinery. Since 1991 I have witnessed a steady decline in the condition of the trail from Bear Harbor to Usal. The efforts to keep it in good condition have fallen far short of those needed. This is with a management policy that currently permits the use of mechanized items like chainsaws and brush cutters. As I write there are slides that need repairing and excess brush and downed trees that all need clearing on the trail. The plan needs to address a transitional timetable that will permit the continued usage of the tools necessary to maintain the trail system in the park. The "vision" needs to meet reality. If the situation is deteriorating now it isn't going to get better if tomorrow you declare it off limits to the tools that maintenance is trained to use. As pointed out in the weather and topography section the park it is a wet, steep area with a mild climate. This makes for a rapidly growing and brushy area. It is not like the inland old growth or a desert area of the state where a trail put in and cleared one year will remain unchanged for decades. The northern coastal climate area produces large amounts of vegetation blocking and narrowing the trails and it does it annually.

In 15 years I have never heard a single complaint in regards to areas of the trail that were obviously well maintained by the use of a chainsaw or brush cutter. Nobody has objected to a mowed campsite or a brush free trail from the trailhead to the Bear Harbor beach. All of this has happened in an area that we now call a wilderness. The visitors aren't bothered by it and most never see it happen. They do notice when it isn't maintained. Comments regarding over grown areas, downed trees and slides are frequent.

A sensible formula for transition to non-mechanized maintenance and a test of its success should be a part of the plan. If they are not I fear that the ability of even the most adventurous will soon be challenged by nature and the quality time that the plan envisions will be a thing of the past and not for future generations of visitors.

I found the following specific areas in the plan to be some that I feel should be edited. Where I thought it would be easier to read I have copied the section from the Plan and at other times I have just referenced the page numbers. I used the pdf file on the Internet as my source document.

Page 2-2 top:

The Hotel Gulch trail is available for horses from Usal Beach Campground to Wheeler. Some trail camps are available along the trail.

Throughout the plan and in many other documents the Hotel Gulch Road has the distinction of being referred to as a trail. Because this is a planning document and will be read by people who will never set foot in the park I believe it is better to call it a road at all times in the plan. Images that we have of a trail in the wilderness and the actual Hotel

5B

5C

Gulch Road are quite different. It is a road. In fact when clear of fallen trees and debris it is one of the best roads in the park. If you have access driving on it is quite pleasant. It is mostly a long gradual incline with some pleasant coastal views. Considerable money was spent to improve it over the past few years. It is certainly the only designated horseback riding area in the park that is currently acceptable for horses. Other currently designated horse trails have not been maintained in a condition that would be considered proper for designation as such. The width and height of brush clearance no longer meets state park guidelines.

**5C
cont.**

The statement, "Some trail camps are available along the trail" sounds like you would find camping between Usal and Wheeler on this *trail*. This is not true. There are sites at Usal and Wheeler but none along the trail. There are a couple of ideal locations but at this time there is nothing other than the gated gravel road.

5D

Page 2-7 top:

The segment between Needle Rock and Orchard Camp is open to vehicular use only during the summer season. During the fall and winter, the road is closed because of the dangers and challenges of road maintenance from weather-related rock falls and landslides. The road is not designed for year-round use and would require re-engineering to be open year-round.

5E

This statement greatly exaggerates any difficulty in maintaining the road to Orchard on a year around basis. That section of road has a couple of areas that are prone to standing water, and some hilly sections that rut if not graded frequently. It would also benefit from a rock overlay in some areas and this has been done in the past. It has not been an area of any significant landslides or rock slides in the past 15 years and does not have a history of such. The majority of the road in that section is much more open than the area north to Four Corners.

Continued monitoring of the road and its closure when wet is a good idea and in the best interest of minimizing the amount of money that needs to be spent on upkeep. The decision to keep the road open to Bear Harbor when dry is a very good one and greatly enhances the recreational, historic, and educational opportunities available in the Park.

Page 2-8

2.1.3 DEMOGRAPHIC PROFILE

LOCAL AND REGIONAL RESIDENTS

The local and regional residents constitute a large portion of Park visitors (40% annually). In addition, local schools and the California Conservation Corps (CCC) use the Park for educational opportunities and also provide help to Park maintenance staff in the form of manual labor (e.g., manual vegetation removal). Local schools and the CCC account for approximately 20% of the Park visitors. Another 20% of Park visitors are Bay Area residents. The remaining percentage is a combination of California residents from other regions, out-of-state and international visitors.

5F

The percentages on usage demographics are simply wrong in many areas in regards to anything I and other hosts have observed. Planning should not be based upon these numbers.

I have done samplings for many years, both at the visitors' center and on the trail and kept some very detailed numbers on where visitors originate their trips from and where they live. I believe that some of the percentages referenced above are from EDAW's contact with Ranger Urbach. Both he and I found them to be in error and corrected them in earlier reviews. The 302's are available for review.

The vast majority of the people spending the night in the park come from the major population centers of northern California and not from the area that would be considered as local or the surrounding communities. 70% would be a minimum number for those visiting from outside of the surrounding area and spending the night. If you break the number out for those spending the night in the trail camps the number is even higher.

The statement that local schools and CCC account for 20% of the visitors is not only an error but also such a big one that it degrades the integrity of the entire document. It is also questionable as to including the CCC's work time in the park as visitors. They are there in an employment capacity. Other work parties and volunteers have not been included.

Day use by the local community residents in the Needle Rock area has dropped considerably as a percentage of the total over the years. I would attribute this to the closure of the road to Bear Harbor when it is wet and the collection of day use fees

Meteorology Section page 2-8

Currently there are no weather recording instruments within the Park, except a precipitation gauge at Shadowbrook.

Most hosts at the Needle Rock Visitors center have maintained some weather data. It is in the daily logbook. Although the record is certainly not complete, significant deviations from the norm are usually recorded. Shelter Cove also has weather data available.

Records and personal observations indicate that rainfall is usually less along the coast than it is inland around Shadowbrook.

Fog reaches its maximum during July and August on the coast, where it can be present 15-18% of the time.

The data on fog does not compare with most other sources. Should this say coastal fog is usually present 15-18 days of the month?

Page 2-20 last paragraph

5F
cont.

5G

5H

Similar to Bear Harbor Creek, Jackass Creek terminates in a small coastal lagoon that occasionally breaches into the ocean during peak winter storm flows.

5I

The lagoons at Bear Harbor and Wheeler differ significantly in size. The one at Bear Harbor is always small or not present at all many years. The one at Wheeler is much larger by comparison and almost always present except for periods of very high ocean surf or heavy winter rains.

Exhibit 2-1 Base Map

The map depicts a change in Mendocino County Road 435 just prior to its crossing Low Gap Creek and at the Jones Beach gate. Up to that point it is shown as "Major Road" and after that "secondary road". Mendocino classifies the entire road from the Humboldt County line to the point at which it ends at Flat Rock Creek the same; primary road. Not too many years ago there was a bridge across Flat Rock Creek and after the county took the bridge out, the road was considered unmaintained beyond that point. I would like to see this corrected on the exhibits, as it is very misleading. Anyone familiar with the roads in the area knows that any portion of the road to Bear Harbor is much better than major portions of the Usal road. They are all of the same status up to Flat Rock Creek. Reference Carl Mechling 707 489 9704 or Patti Black Mendocino Roads.

5J

Exhibit 2-2

Same problem with the road depiction and additionally the entire topo coloring elevation appears to be off when comparing it to known elevations. The visitor center for example is at 200 feet above msl. The area is steeper and the elevations of the Park are higher than depicted by the coloration.

5K

Page 2-54

Roosevelt elk were reintroduced into the Park in 1982.

5L

The elk herd that is in the park was a project intended to introduce them into the Kings Range area and not into the Sinkyone. They were released in Hidden Valley on the north east side of Chemise Mountain. They wandered a lot of the first couple of years and a majority of the population decided to locate in the Park. I believe it goes to accuracy to word this correctly. The elk are there but it wasn't a planned reintroduction into the Park. The elk probably found the former ranch's lush grazing lands located along the coastal terraces between Bear Harbor and Whale Gulch to be a much better habitat. Much of this prior grazing habitat has been lost under park management.

Page 2-63

Briceland Road (County

Road 435) runs parallel to the coast within the Park starting at Four Corners and ending at Orchard Camp. The road is narrow, subject to washouts, and is closed during the rainy season. Parking is limited in most areas of the Park, but available in designated areas such as overnight parking at

5M

**5M
cont.**

Usal Beach Campground, and day use parking at Orchard Camp and Needle Rock. Parking at Needle Rock currently is arranged in a manner that intrudes upon the scenic beauty of the area.

The above paragraph would lead a reader to believe that the road from Four Corners to Orchard camp is closed in the rainy season. Only the portion of the road from Needle Rock to Orchard camp is closed in the rainy season and as I previously mentioned this is only a recent decision to see if it will improve the overall condition by lessening winter wear.

Overnight parking is available at both Needle Rock and the Orchard Camp trailhead and not just Usal. The ability of visitors to park at Orchard area is a significant benefit to its continued usage. It is quite large, not in a vista area, and reduces the number of vehicles that remain at Needle Rock. Parking along the Briceland Road is an option available at the Jones Beach area and is popular with many visitors, especially the locals people familiar with Jones Beach.

Page 2-64 Table 2-5

5N

Family Camping Facilities

Primitive/undeveloped (up to 8 people and two vehicles, tent space, stove, table, and nearby piped water, chemical or vault toilet)

The above quote from the table is a generic description of a typical primitive campsite. It is very wrong for the primitive sites at Sinkyone and should be amended.

There are no parking places at the sites in the northern part of the park. They are all walk in spots with adequate parking in the Orchard and Needle Rock area. These same areas provide day use parking. Only Usal has some "car" camping.

There is no piped water nearby at any of the sites. Piped water is only available at the Needle Rock Visitor Center, which is correctly referenced in another area of the plan.

Most of the sites are not large enough to accommodate two tents and some will not support larger sized tents. Listing a maximum site capacity of 8 exceeds the tenting capacity of many sites. This is also true of the trail camps, especially those at Anderson.

The vault toilet was removed from the Railroad camp and requires usage of the Bear Harbor or Orchard parking area toilets.

The table also lists 4 trails in the park. I am currently only aware of two connecting trails. The Lost Coast Trail running from the northern to the southern border of the Park and the Hotel Gulch Road, which connects Wheeler and Usal and is designated as a trail. The status of the historic Low Gap trail, which was one of the nicest trails in the Park, seems to be an unknown. A portion of it still remains but is not on the plan maps. When the

upper portion of it was taken out for restoration the public was informed that it would be rerouted and restored but the current plan does not show it. It was by far the most educational trail in the park as it covered in 1 mile almost every geological and plant form available to visitors. It was fantastic woods to beach experience.

**5N
cont.**

Page 2-67 first paragraph

Jones Beach and the beach at Jackass Creek are not accessible by road, so they experience less use compared to Usal or Bear Harbor.

5O

The access to Jones Beach via the Briceland Road is as good or better than it is to Bear Harbor. You drive by Jones Beach to get to Bear Harbor. The beach, however, is totally underwater at high tide and that is the reason for it not being as popular. It is also a more exposed beach and not as family friendly. Not mentioned is the Needle Rock Beach, which runs from Needle Rock to Flat Rock Creek. It was extremely popular until the trail access was removed following a slide. Many people would like to see a trail access to this great beach re-established and their comments are in the planning meeting notes. It has an excellent black sand beach and is a well-known spot for surf fishing.

Paragraph 2.1.10

Needle Rock pre-dates the 1920's by more than 20 years. File picture with the largest number of buildings is about 1900, operations as a loading station started prior to that.

5P

Page 2-68

Paragraph 2.1.11

The road from Orchard to Needle Rock is open in the dry season, which can differ from a traditional summer calendar or summer visitor season.

5Q

This same section reads somewhat like the Park starts at Four Corners. There is about a half mile of private property between Four Corners and entering the Park. The Park does not start at Four Corners. There is an entrance sign and informational Kiosk near the boundary.

There is also a very short section of old driveway or road at Jones Beach. This is depicted on the map exhibits and it is gated. Park maintenance frequently uses this road to access the Jones Beach area for "housekeeping" purposes. It also serves as the trail from the road and connects to the Lost Coast Trail.

Page 2-69

Parking at the Orchard parking area can accommodate a much larger number than 5 vehicles. With even a little bit of consideration for others the place easily holds 15-20 cars and with some direction it can hold many more than that. Leaving this number at 5 could greatly confuse anyone closely reading the plan and wondering where all the cars for day use and the sites at Orchard, Railroad, and Bear Harbor are parking.

5R

The wide area of the northern part of the road at Needle Rock can likewise accommodate an adequate number of vehicles and doesn't become unsightly. Park literature should encourage car-pooling as much as possible and mention limited parking.

**5R
cont.**

Page 2-70 Fire Protection

There is also volunteer fire department in Whale Gulch and they have a vested interest in responding to a fire in the Park. A communications procedure should be established with them, as they might be the closest responders.

5S

A fire hydrant is located at the Needle Rock Visitor Center.

Page 2-74

AMERICANS WITH DISABILITIES ACT AND STATE PARKS ACCESSIBILITY GUIDELINES

5T

Historically, access to the Bear Harbor Beach and associated camping areas have been good enough over the years that many people with disabilities have been able to enjoy the opportunity to camp in that part of the Park. In addition to keeping vehicle access to the Orchard parking areas I feel it is important to maintain the trail and campsites in that part of the park so they may continue to do this. This trail was put in over the old driveway to the house that was at Bear Harbor. It is one of the few naturally very flat trail areas in the park. Weather this past winter resulted in damage to the trail that now makes it a challenge for less mobile people to get to the beach. It should be a goal of the Plan to maintain and improve this historic ADA access.

Page 3-28/29 Guideline RT-1C

Work with Mendocino County to evaluate options to transfer ownership of Briceland Road from Four Corners to Bear Harbor to State Parks.

5U

A few practical aspects of the above should be considered prior to considering this action. The county road crew is on call and a much more capable resource than the park maintenance department when it comes to dealing with roads. I have lived in the Park through many road-closing storms and I take comfort in knowing that the county is in charge of the road.

They have funding for road maintenance from the state transportation budget. Removal of the road from the county system would result in placing the entire road budget upon the limited resources of the department. As State fiscal capabilities become strained this would result in money that could be used for other park projects being used for road maintenance. The future of the park road maintenance would depend upon limited grants and compete with other park projects.

It is to the benefit and not detriment of the Department to foster and maintain the current relationship.

The Park does not start at Four Corners so this would also make the Department liable for road maintenance outside of the park.

Page 3-29 Guideline RT-1E:

Explore opportunities to establish an appropriate staging area in the vicinity of the river corridor parcels.

5V

The vast majority of visitors coming to the Park have no desire stop at a location near Whitethorn. They are on a scheduled amount of time off, have driven four or more hours and desire to be at a campsite or starting on the trail down by the ocean. The area along the Mattole would hold little or no interest.

Attendance at the Park has dropped steadily over the past few years and with continued increases in transportation costs this is likely to continue. It would be foolish to start any kind of staging area or new visitors' center outside of the park until such resources are at capacity inside of the Park. Planning further development in that area would be a drain on limited resources. This is not a "build it and they will come" idea. Current State parking at a river site area near Whitethorn is a frequent dumpsite. Development along the river corridor places a much greater aquatic system in danger of a negative environmental event than any currently used area inside the Park.

Exhibits 3-1 and 3-2

Both maps have the same major road stopping before Flat Rock Creek designation error that I have previously mentioned.

Page 170 Impact Haz

The Department recently installed a solar system at the Needle Rock House, which significantly reduced dependence upon propane, thereby Reducing the need to transport propane into the Park.

5W

I worked closely in the design and installation the PV solar system. Although, I believe it will be a major cost savings and will reduce the amount of propane used I would consider it being overly optimistic to say it will *significantly* reduce the need to transport propane into the Park. That was not a design objective.

The propane storage capacity in the Park is such that even with a reduced usage the number of deliveries may stay about the same. Delivering propane is not only based upon need but also a weather-timing event done in the late fall and early spring. This eliminates the need for rainy season deliveries. A check of records will show that the truck comes about 3-4 times per year. Because of the size of the storage tank and the desire not to need delivery in the wet season the timing of deliveries should stay the same, the amount needed will be reduced. Stretching out the delivery with the result of a delivery being needed in the wet season is undesirable so it is therefore unlikely the hazard related with the deliveries, which are minimal, will change.

5X

Implementation of the General Plan may result in increased human activities throughout the Park. The increase in interaction between visitors and wildland habitat would increase the risk of wildland fires, which may affect visitors to the Park and adjacent properties.

The General Plan does not propose any changes in Park activities that would likely cause an increase in human activities. Most visitors already believe it is being managed as a wilderness park. It is just as likely to result in a decrease.

The plan does change the management of major trail and camping areas to non-mechanized methods and this could result in a fuel build up, especially in camping areas and result in a higher potential for wild fire.

I appreciate the opportunity to comment on the General Plan and look forward to continued participation.

Respectfully,

A handwritten signature in black ink, appearing to read "Michael D. Rydjord". The signature is fluid and cursive, with the first name "Michael" being more prominent.

Michael D. Rydjord

Response to Letter 5 – Michael Rydjord

- 5A -** The General Plan is the primary management document for a park, establishing its purpose and management direction for the future. This document also constitutes the Environmental Impact Report, as required by the Public Resources Code. Preparation of this document follows specific general plan guidelines adopted by the Department of Parks and Recreation.

Public involvement has been an important component throughout this planning process. The general plan review process has included various methods to involve the public and to receive public input, including public meetings and workshops, user surveys, interviews, and a formal public review and comment period. Park visitors, local residents, specific user groups, and agencies have provided important information and concerns regarding the future of the park.

- 5B -** The Department of Parks and Recreation recognizes the need for general plans having broader scope with a focus on purpose and direction, so that the guiding document will be more adaptable and enduring. While the goals of an adopted general plan remain constant, specific approaches for implementation can adjust with new technology, changing circumstances and visitor needs. Subsequent management plans addressing specific management needs, such as roads and trails, are enabled by the General Plan.

Trail construction and maintenance, including brushing and clearing of existing trails, can be accomplished with hand tools. This approach is commonly used at state wilderness park units. Your statement that the plan should address a formula for transition to non-mechanized equipment is acknowledged. Please see Response 8F regarding the Department's guidelines and policies pertaining to the management of State Wilderness.

- 5C -** The former Hotel Gulch Road is currently designated as a trail for public use and is known as Hotel Gulch Trail. The use of roads as trails is consistent with other State Parks in California. Exhibits in the final General Plan will be revised to read "Hotel Gulch Trail."

- 5D -** There are no designated camping sites along the Hotel Gulch Trail. The following text revisions will be made in the final General Plan/EIR:

Section 2.1.1, Existing Land Use, Parkwide Land Uses

The Hotel Gulch trail is available for horses from Usal Beach Campground to Wheeler. ~~Some trail camps are available along the~~

~~trail.~~

- 5E -** The Needle Rock to Orchard Camp section of Briceland Road is composed of native earth and gravel. As such, the road cannot withstand motor vehicle use during wet winter months. All season vehicle use on this road section will result in deep tire ruts, eventually gullies, and ultimately complete roadbed deterioration.
- 5F -** The Department appreciates your comments and additional information regarding demographics and visitor use at the Park. The following text revisions will be made in the final General Plan/EIR:

Section 2.1.3, Demographic Profile, Local and Regional Residents

The local and regional residents constitute a ~~large~~ portion of Park visitors ~~(40% annually)~~. In addition, local schools and the California Conservation Corps (CCC) use the Park for educational opportunities and also provide help to park maintenance staff in the form of manual labor (e.g., manual vegetation removal). ~~Local schools and the CCC account for approximately 20% of the Park visitors. Another 20% of Park visitors are Bay Area residents. The remaining percentage is a combination of Other visitors to the Park include~~ California residents from other regions, including the Bay Area, as well as out-of-state and international visitors.

- 5G -** Currently there are no weather recording instruments within the Park. Park hosts have made daily weather observations and have recorded them in the daily logbook at the Needle Rock Visitor Center. We agree that observations suggest that rainfall is usually less along the coast than in inland areas such as Shadowbrook.
- 5H -** Thank you for the clarification. The following text revisions will be made in the final General Plan/EIR:

Section 2.1.4, Physical Resources, Meteorology

Sunny days occur along the coast on an average of 55% of the time over the course of a year, fluctuating from 45% in the winter to 65% during the rest of the year. The same amount of sunshine reaches inland, however in the summer it can increase up to 80% inland. Fog reaches its maximum during July and August on the coast, where ~~it coastal fog can be~~ is usually present 15-18% ~~of the time~~ days of the month.

- 5I -** The Plan acknowledges Bear Harbor Creek as a small second-order ocean tributary, and Jackass Creek as a larger third-order ocean tributary.

Within the Plan, reference to these creeks and their respective lagoons is included to highlight their hydrologic similarities.

- 5J -** The road from Needle Rock to Orchard Camp, in terms of surface conditions and maintenance requirements, is essentially the same. Mendocino County no longer maintains this road from the north side of Flat Rock Creek to Orchard Camp.
- 5K -** Exhibit 2-2, Topography, will be reviewed. Within the Plan, map resolution varies according to the intended application. This map is intended to be illustrative, as it was derived from GIS modeling data. We will attempt to make this exhibit more accurate or substitute it with a USGS topography map.
- 5L -** It is correct that Roosevelt elk migrated into the Park after being introduced into the Kings Range in the early 1980s. The following text revisions will be made in the final General Plan/EIR:

Section 2.1.5, Biological Resources, Other Forest-associated Species

Roosevelt elk were introduced into the Kings Range and are known from the Park since the 1980s~~reintroduced into the Park in 1982~~.

Historically, elk inhabited moist forests and coastal areas from San Francisco Bay north to Vancouver Island, but populations were extirpated by over-hunting.

- 5M -** Briceland Road from Four Corners to Needle Rock is typically open during the rainy season as road conditions allow. However, during this season periodic closure of the road for emergency repairs is not uncommon. The section of road from Needle Rock to Orchard Camp is closed during the rainy season to reduce the surface damage associated with motor vehicles. Overnight parking occurs at Needle Rock and Orchard Camp. The following text revision will be made in the final General Plan/EIR:

Section 2.1.9, Recreational Resources, Recreational Facilities

Briceland Road (County Road 435) runs parallel to the coast within the Park starting at Four Corners and ending at Orchard Camp. The road is narrow, and subject to washouts, ~~and~~ The section of road from Needle Rock to Orchard Camp is closed during the rainy season.

- 5N -** The Department appreciates your comments regarding camping facilities. The following revisions will be made in the final General Plan/EIR:

Section 2.1.9, Recreational Resources, Recreation Facilities

Table 2-5 Existing Recreation Facilities in Sinkyone Wilderness State Park		
Facility Description	Total	
	# Sites	Visitor Capacity
Family Camping Facilities		
Primitive/undeveloped (up to 8 people and two vehicles, tent space, stove, table, and nearby piped water, chemical or vault toilet)	52	416
Developed	0	0
RV Hookup	0	0
Trail Campsite	12	96
Hike-in or Bike Campsite	0	0

The Low Gap Trail was determined to have a problematic alignment and it was in poor condition. It has been removed. Determinations regarding an alternative alignment for the Low Gap Trail will be made during the development of a Roads and Trails Management Plan.

- 50 - The Needle Rock Beach trail was removed due to chronic geologic instability and archeological issues. The Department does not plan on providing a trail to this beach.
- 5P - Needle Rock was definitely in existence prior to the 1920s. The following text revisions will be made in the final General Plan/EIR:

Section 2.1.10, Operational Facilities, Buildings

Sinkyone Wilderness SP includes 14 buildings that are located throughout the Park and 21 vault toilets. The most well known and most often used buildings are the Needle Rock Visitor Center and the old barn house, both located on the north end of the Park on Briceland Road. Needle Rock was a small settlement that was well established ~~inby~~ the ~~early 1900s~~1920s as a shipping point and dairy operation. The Needle Rock Visitor Center was the home of the Calvin Cooper Stewart family that settled at Needle Rock.

- 5Q - Your comments regarding roads and park circulation have been noted. Revisions to the general plan are not recommended.
- 5R - The Department appreciates your comments regarding parking at Orchard Camp. Further development of a Roads and Trails Management Plan will review and establish appropriate parking densities for parking throughout the Park. The following revisions will be made in the final General

Plan/EIR:

Section 2.1.11, Circulation, Parking

Limited parking is available in the Park. Several parking places are available at the Needle Rock Visitor Center and ~~approximately 5 are available~~ at Orchard Camp. At the southern end of the Park, Usal Beach Campground and Usal Beach also provide parking areas.

- 5S -** The Preliminary General Plan/Draft EIR emphasizes cooperation among fire suppression agencies, as stated in the following guideline on page 3-26 of the Preliminary General Plan/Draft EIR:

Guideline FIRE-1A: Coordinate with appropriate fire suppression agencies, such as the California Department of Forestry and Fire Protection (CDF) and local volunteer fire departments, to develop a Wildfire Management Plan for the Park. The plan should address all aspects of wildfire planning, including prevention, pre-suppression, and suppression. The plan should identify modified fire suppression methods and ways to protect sensitive park resources. Wildfire protection and suppression activities will be accomplished in accordance with the existing Memorandum of Understanding (MOU) between the Department and CDF and the wildfire management plan, once approved.

- 5T -** The Department is committed to achieving programmatic access throughout the State Park System and in each of the parks. Although this trail does not currently meet ADA standards, it may be evaluated for opportunities to improve accessibility.
- 5U -** The Department appreciates your comments and understands your concerns and the on-going costs of road maintenance.
- 5V -** The Department of Parks and Recreation must explore all opportunities to provide high quality recreation experiences for future generations. Increasing demands for access to Sinkyoone Wilderness State Park may require the creation of alternative staging areas near the Park in an effort to maintain the intended wilderness values within the Park.
- 5W -** The use of a solar system at Needle Rock House should reduce the use of other forms of energy. For clarification, the following text revisions will be made in the final General Plan/EIR:

Section 4.5.7 Hazards and Hazardous Materials, Impact Analysis

Implementation of the General Plan would not result in a substantial

increase in the use of hazardous materials (e.g. propane) within the Park. Day-to-day operation of the Park does not involve the transport or disposal of hazardous materials, and the Park would continue to contract with licensed providers of propane. The Department recently installed a solar system at the Needle Rock House, which ~~significantly reduced dependence upon the use of~~ propane, ~~thereby and may~~ ~~reduc~~ing the need to transport propane into the Park. All use of hazardous materials, as well as the development of new storage tanks or areas, would be in compliance with state and federal laws and regulations. Furthermore, the park is not located within one-quarter mile of a school or airport.

- 5X -** As California's population continues to increase and diversify, the demand for coastal and inland recreational opportunities at Sinkyone Wilderness SP is likely to increase, both in the number of visitors and in the types of recreational activities and facilities future visitors might seek. This general plan presents goals and supporting guidelines to provide a high quality recreational experience to visitors as well as to provide essential facilities to support wilderness and non-wilderness uses.

As explained in Chapter 4, Environmental Analysis, this general plan and EIR were prepared to address environmental impacts that may result from the implementation of the management goals and guidelines, as well as from area-specific management. Emphasis is given to potentially significant environmental impacts that may result from all future Park management, development, and uses within the Park that are consistent with these goals and guidelines.

The General Plan states that: "Implementation of the General Plan may result in increased human activities throughout the Park. The increase in interaction between visitors and wildland habitat would increase the risk of wildland fires, which may affect visitors to the Park and adjacent properties." Although the precise amount of increased future use is unknown, these statements are made as a disclosure of potential impacts that may occur. This assessment was based on the permitted use and opportunities described in the guidelines for recreation, facilities, interpretation and education in Section 3.2.1 of the General Plan. As stated in the Chapter 4, Environmental Analysis, page 4-18, "Implementation of Goal FIRE-1A through FIRE-1C would ensure monitoring and discouragement of activities that may start wildland fires, and would ensure the provision of information to visitors on Park rules regarding bonfires, fire crackers, and other inappropriate activities that may start fires."

Please see Response 5B regarding the use of non-mechanized maintenance methods in the wilderness areas.

InterTribal Sinkyone Wilderness Council

Mail: P.O. Box 1523 Ukiah, Ca. 95482 Office Location: 200 S. School St., Suite 1

Protecting and Managing America's First InterTribal Wilderness

(707) 463-6745

August 7, 2006

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ADMINISTRATION

Hawk Rosales
Executive Director

Attn: Dave Keck
California Department of Parks and Recreation
Northern Service Center
One Capitol Mall, Suite 500
Sacramento, CA 95814

Re: Comments on Sinkyone Wilderness State Park Preliminary General Plan and Draft EIR

Dear Mr. Keck:

The InterTribal Sinkyone Wilderness Council, a consortium of ten federally recognized tribes, has been an active partner with State Parks' North Coast Redwoods District for the past fifteen years. The Council owns and manages the 3,845-acre InterTribal Sinkyone Wilderness, which is located adjacent to and upslope of the Sinkyone Wilderness State Park. In working together, the District and the Council have achieved benchmark successes through collaborative projects addressing cultural-natural resource protection, education, wilderness restoration, and public recreation. We look forward to many more years of partnership with the District and we realize that the completion of the Park Plan will present even more opportunities for working together.

Enclosed are initial suggestions our Council has regarding the wording for the main Cultural Resources section of the Plan. Although we had provided these comments to the Department in April 2004, we are disappointed that none of our comments were incorporated into the current Preliminary General Plan draft. We hope that the Department will seriously consider the Council's enclosed comments. The Council is currently reviewing the Plan to address additional concerns relating to other sections of the Plan that pertain to cultural resources, as well as various other elements of the Plan.

Because the period for commenting on the current draft of the Plan has been rather short, the InterTribal Sinkyone Wilderness Council respectfully requests a period of thirty (30) additional days beyond August 7, 2006 to fully review and provide the Department with these additional comments.

Due to our unique relationship with State Parks, we believe that our request for such an extension is reasonable. The comments the Council will provide will be a valuable contribution toward completion of this important Plan.

Sincerely,

Hawk Rosales
Hawk Rosales
Executive Director

cc: Steve Horvitz, Superintendent North Coast Redwoods District

encl: InterTribal Sinkyone Wilderness Council's comments on Cultural Resource Section

6A

6B

InterTribal Sinkyone Wilderness Council is a Non-Profit Consortium of California Indian Tribes

Native Stewardship Cultural Preservation Watershed Rehabilitation and Management Ecology Education

INTERTRIBAL SINKYONE WILDERNESS COMMENTS

August 7, 2006

2.1.6 CULTURAL RESOURCES

NATURAL HISTORY

The topography, coastal setting, presence of numerous perennial and seasonal water sources, wide range of floral and faunal species and other natural resources made this region a prime location for ~~human~~ indigenous peoples' habitation and economic pursuits over thousands of years. The region's history is rich in native Indian peoples' cultural heritage and land stewardship. Aactivity associated with tanbark processing, shipping, logging, grazing and recreational industries is associated with the arrival of the area's non-native settlers.

PREHISTORIC SETTING

Archaeologists identify ~~The~~ Paleo-Indian Period (10000 B.C. to 6000 B.C.) saw as being the first demonstrated entry and spread of humans into California with most known sites being situated along lakeshores. Characteristic artifacts noted in the lithic assemblages include fluted projectile points and flaked crescents. ~~Numerous occurrences~~ Examples of this Ppattern's distinctive artifacts are reported and can be affiliated with documented assemblages in California and throughout North America.

It is important to note that many North American Indian peoples do not subscribe to the theory that they migrated to those areas that are considered to be their historic territories. Rather, most Indian tribal histories assert that its peoples were created within their lands.

The beginning of Lower Archaic Period (6000 B.C. to 3000 B.C.) coincides with the middle Holocene climatic shift to more arid conditions that brought about the drying up of the pluvial lakes. Indigenous peoples' ~~S~~subsistence appears to have been focused ~~more~~ on plant foods although hunting clearly ~~still~~ provided important food and raw material sources. Settlement appeared to be semi-

sedentary with little emphasis on material wealth. ~~Distinctive artifact types include large projectile points, milling slabs and handstones.~~

The Middle Archaic Period (3000 B.C. to 1000 B.C.) starts at the end of mid-Holocene climatic conditions when weather patterns became similar to present-day conditions. Discernable cultural change was likely brought about in response to these changes in climate and accompanying variation in available floral and faunal resources. Economic systems were more diversified and ~~likely included the introduction of acorn~~ various food processing technologies. Hunting remained an important source of food and raw materials although reliance on plant foods appears to have dominated the subsistence system. ~~Typologically and technologically important artifacts characteristic of this period include the bowl mortar and pestle and the continued use of large projectile points.~~

A marked expansion of sociopolitical complexity marks the Upper Archaic Period (1000 B.C. to A.D. 500), with the development of status distinctions based upon material wealth. Shell beads gained in significance as possible indicators of personal status and as important trade items. ~~This period retained the large projectile points in different forms, but the milling stone and handstone were replaced throughout most of California by the bowl mortar and pestle.~~

The Emergent Period (A.D. 500 to 1800) is distinguished by the advent of several technological and social changes. The bow and arrow were introduced, ultimately replacing the atlatl. [If the atlatl is being replaced, then why isn't it mentioned previously?] Territorial boundaries between groups became well established and were have been documented in early historic accounts.

~~Cultural traits that distinguish this pattern include pre-interment grave-pit burning, tightly flexed burials and cremation. Artifact assemblages include *Dentalium* shells, bone and antler harpoons, adzes, wedges and mauls, net sinkers, *Halotis* ornaments, mortars and pestles (Moratto 1984).~~

ETHNOGRAPHIC SETTING

The area from the northern Mendocino coast to southern Humboldt was occupied by a group of five tribelets collectively ~~called~~ referred to by ethnologists as the Sinkyone. These five groups spoke related Athabascan dialects and shared cultural similarities (Evans 1987). ~~Numerous villages were recorded by Baumhoff (Evans 1987) though only one, Usal, was noted as being on the coast. Estimates of Ppre-contact populations estimates range from 740-4,000 individuals, based on various formulae, however Kroeber (1925) estimated that only approximately 200 remained by 1910.~~

The eastern boundary of Sinkyone territory is defined roughly by the main ridgelines immediately east of and parallel to the reaches of the mainstem and South Fork Eel River located between the towns of Scotia and Leggett. From there, Sinkyone territory extends to the Pacific Ocean, its western boundary being the coastline located between the mouths of Four Mile Creek and Usal Creek. It is bordered to the west and to the north by the Mattole, the Bear River, and the Wiyot territories; to the east by the Nongatl, the Lassik, and the Wailaki territories; and to the south by the Cahto and the Coast Yuki territories. These territories comprise the homelands of the indigenous Indian peoples bordering the Sinkyone Indian territory.

~~Sinkyone villages were habitation was mainly located largely inland and in some instances along the coast, along rivers and drainages. These would have been used primarily during winter. In the other months, Seasonally, family groups would go to the hills to hunt or gather plant foods or to the coast to collect shellfish, fish, sea mammals, waterfowl or seaweed (Evans 1987). Seasonal salmon runs were especially important as a source of winter food.~~

~~Other products collected by the Sinkyone included iris, spruce, fern, hazel and redwood fibers for basketry or rope, skins for blankets or clothing, wood and horn for chisels, obsidian traded from distant locations, redwood for building slabs, madrone bark for structures, and shells for beads. Obsidian was traded from distant locations.~~

The "Indian Wars" of Humboldt and Mendocino (1860-1865) were spurred by the increasing American population in the area following California's

admittance to the Union. In 1850, the California legislature passed laws making it possible to force Indians into labor and to bind their children over to white citizens. These acts were met with some resistance, including a range of events from theft to murder. ~~A number~~ Large numbers of Indian families and tribal groups were massacred during these times.

One such event has become infamous locally. Sally Bell, a ~~Wailaki~~ Shelter Cove Sinkyone woman interviewed by Kroeber, saw her family massacred ~~at near~~ Needle Rock as a child. She hid in the woods ~~for several months until she was found by her brother, taken to Philipsville,~~ and was subsequently raised by a white family. She ~~had either two or three Indian husbands, and eventually received a 160-acre allotment of land in the Sinkyone region, where she and at least one of her husbands and her family lived~~ (Evans 1987).

HISTORIC SETTING

The first European settlers known in the project area were Archibald Hamilton and William Oliver, who claimed land in Shelter Cove in the 1850s (Roscoe 2002). Oliver was subsequently killed by Indians whom ~~they~~ he had accused of stealing cattle. Hamilton then left the area, which was next homesteaded by the three Ray brothers, who ~~married Indian women and settled at Shelter Cove Ranch.~~

Settlers began occupying land around Bear Harbor in the 1860s, using the land for cattle and sheep grazing. Until then, the only ~~paths in routes leading into and through~~ the area were Indian trails ~~which generally followed ridgelines in from the coast.~~ The European settlers built the Humboldt Trail in 1862, which went to Eureka [from where?]. Another trail was built from the Eel River valley to Bear Harbor in 1865. New settlers, including the Kaiser brothers, added to the industry in Bear Harbor. [Why mention the Kaiser brothers if you don't state how they added to the industry]. Ranching, logging and tanbark operations expanded. Surf landing spots for shipping soon gave way to wharfs and wire chutes (Roscoe 2002). By 1890, a railroad had been constructed to run between the coast at Bear Harbor and J.B. Stetson's sawmill, 3 miles inland.

Bear Harbor continued to grow as a port, with concomitant expansion of the wharf and railroad line, as well as local ranches, timber shipping ports and other businesses, residences, and a school. Damage from the 1906 earthquake started the decline of the local industry. The local school closed in 1908 because of lack of work (and presumably people) in the area. The town of Needle Rock likewise enjoyed a lumber boom, then bust (Roscoe 2002), and later converted to ranching. Needle Rock Ranch included two residences, bunkhouses, other outbuildings, and a railway (DPR 1988).

Northport (Anderson Landing) began as a shipping point developed by Robert Anderson in the 1870s using a wire chute (Roscoe 2002). Wheeler, located in the old Northport area, was one of the last logging company towns established in California. Sawmill operations there commenced in 1948 and had shut down by 1959.

Usal began as a ranching area, but lumber interests had moved into the area by 1888 (Roscoe 2002). A small town, population approximately 160, grew to support the business. There were approximately 40 buildings, a wharf, and sawmill.

The towns of Bear Harbor, Usal, Wheeler, Northport and Needle Rock [should be listed in geographical order, North to South: Needle Rock first, ending with Usal] all supported working communities, however successive waves of industry recycled or removed construction from the previous one, leaving little surface evidence of these activities today (Resource Protection Division 1988).

BACKGROUND RESEARCH

Background research began with an interview with National Park Service archaeologist Karin Anderson, who provided an overview of archaeological efforts in Sinkyone Wilderness SP. Documents regarding archaeology, historic documentation, and copies of State Parks site record forms for most of the resources within the Park were obtained from the State Parks North Coast Redwood District Office in Eureka.

An information request was submitted to the North Coast Information Center (NCIC), for the project area as a whole. The purpose of the NCIC search was to

determine whether there were previously recorded historic resources or if archaeological surveys had been performed within or in the vicinity of the project area. The NCIC had records of almost 20 archaeological surveys that had been conducted within the project area (Appendix E, not publicly available). Site record forms pertaining to resources identified during those surveys are on file with ~~Sinkyone Wilderness SP~~ the State Parks North Coast Redwood District Office. ~~Archaeological surveys within the Park have focused on the interior sections of the Park, rather than the coastal strand.~~

Archaeology of the Project Area

Formal archaeology in the Park vicinity began in the late 1970s. Archaeological surveys have been conducted in relation to prehistoric resources, logging operations, road repair, and slope restoration, as well as other projects.

~~Prehistoric and historic use of the project area appears to be well understood. Historic maps and deeds round out the historic picture.~~

Cultural resources within Sinkyone Wilderness SP have been subjected to a number of impacts, including theft, that have caused damage or total destruction. Chiefly, past logging activities have resulted in widespread damage and destruction of cultural resources. Chiefly Also, erosion of various types ~~(coastal, stream, alluvial)~~ has washed away site components. Other factors, such as removal, destruction or recycling of structures in the historic lumber towns and mill areas have left little surface evidence of the large-scale exploitation of lumber in the 19th and 20th centuries in the project area. Foot or equestrian traffic, looting, construction or maintenance of Park facilities, and road removal or re-contouring have caused cumulative damage to some sites. In spite of the imposing terrain of the project area, it clearly has been the focus of significant prehistoric and historic development. ~~The potential for retrieving important data from known and as-yet undiscovered resources is significant.~~

Native American Concerns

The InterTribal Sinkyone Wilderness Council (Council) was formed in 1986 to address local Indian ~~tribe~~ tribal concerns in the Sinkyone region. The Council consists of ten (10) federally recognized tribes whose memberships include

~~descendants of original Sinkyone Indian families, whose~~ The Council's goals include the preservation, protection, and restoration of cultural-natural resources and the reinstatement of local Indian peoples' traditional values and land uses in the Sinkyone region. The Council owns lands located adjacent to and east of the Sinkyone Wilderness SP. The Council developed and executed conservation easements to protect in perpetuity the cultural and natural resources within the InterTribal Sinkyone Wilderness. The Council administers projects in cultural resource protection, land management planning, ~~reforestation~~ forest stewardship, salmon stream restoration, and watershed rehabilitation. The Council emphasizes traditional cultural uses by local tribal members, resource restoration and stewardship, and ecology education. InterTribal Sinkyone Wilderness Council priority projects include: (1) ~~development of limited~~ public access low-impact InterTribal campgrounds and trails that will link ~~directly to the Lost Coast Trail in the Sinkyone Wilderness State Park, which traverses the longest stretch of coastal wilderness in the lower~~ 48 states; (2) continued salmonid habitat restoration work at Wolf Creek (Jackass Creek) and other Sinkyone streams; (3) planning for Watershed Rehabilitation-Roads Removal Program on the Council's InterTribal land; (4) ~~development of a Forest Management Plan and an Integrated Resource Management Plan to guide the InterTribal Parks possessive long-term stewardship;~~ (4) advocacy during the timber harvest plan process for protection of Sinkyone cultural resources on neighboring industrial timberlands; and (5) resource management partnership projects with California State Parks in the adjacent Sinkyone Wilderness State Park.

The Council has formally commented during the entire planning process to express ~~their~~ its concerns and ideas for the Preliminary General Plan/Draft Environmental Impact Report. Among the topics brought for discussion were Council ownership and management of Four Corners, protection of cultural resources in cooperation with Council and other stakeholders, cooperative management of Park resources, watershed restoration, road to trail conversions, and maximum wilderness designation.

sCultural Resources

Culturally significant areas within the Park were identified as part of the planning process and the General Plan/ Environmental Impact Report aims to protect these resources and includes coordination with authorized Native American ~~stakeholders~~ tribal representatives to identify and preserve the important Native American sites.

Protection and management of significant resources are important issues addressed in the General Plan/ Environmental Impact Report.

Historic lumber towns and mills existed at Needle Rock and Bear Harbor. Removal, destruction, or recycling of structures has left little surface evidence of the large-scale exploitation of lumber in the 19th and 20th centuries in the Park. Foot or equestrian traffic, looting, construction or maintenance of Park facilities, and road removal or re-contouring has caused cumulative damage to some historic sites. Adequate protection and interpretation of appropriate resources and the evolution of cultural landscapes for their historic significance are addressed in the General Plan/ Environmental Impact Report.

Letter 6 attachment

Cultural Resources

Cultural resources consist of significant and potentially significant prehistoric and ethnographic sites, historic and ethnographic resources, and cultural landscapes. Sinkyone Wilderness SP includes an abundance of important cultural resources, including numerous significant Native American sites, historic roads and trails, and historic structures. The following goal is aimed at protecting significant cultural resources in the Park:

Goal CUL-1: Protect significant prehistoric and historic cultural resources in the Park.

- < Guideline CUL-1A: Develop an inventory, GIS mapping system, and database for those cultural resources within the Park that may be eligible for inclusion in the National Register of Historic Places and/or the California Register of Historic Resources. The database shall be treated with the strictest of confidentiality and shall be accessible only by authorized Park personnel and authorized Native American tribal representatives.
- < Guideline CUL-1B: Consult regularly with local Native American ~~people and groups~~ tribes and tribal organizations who have traditional ties to resources within the Park to ensure productive, collaborative working relationships, especially when considering management practices, such as the Department's gathering policy, and interpretation involving the Park's natural and cultural resources of interest and concern to them.
- < Guideline CUL-1C: Prepare a parkwide Cultural Resources Management Plan (CRMP) that establishes an ongoing management process to record and develop findings of significance for cultural resources in the Park that

Letter 6

attachment

are historically or archaeologically important. Consistent with other Park goals, including the protection and preservation of the prime natural resources, develop a long-range management strategy that includes preservation, stabilization, rehabilitation, or reconstruction for the Park's significant cultural resources.

- < Guideline CUL-1D: Identify and evaluate potential cultural landscapes within the Park. Cultural landscapes are defined, in part, as landscapes that evolved through use by people whose activities or occupancy shaped them. They can be comprised of aggregates of such cultural resources as agricultural communities, homestead sites, ethnographic or ethno historic landscapes, trails, old roads, cemeteries, orchard remnants and homestead sites, as well as natural resources, topography, and their associated features. Potential cultural landscapes at the Park that need additional investigation, research, and evaluation include the Needle Rock House and Barn, Orchard Camp, Bear Harbor, Wheeler, Usal, and other historic items such as the old railroad bed.
- < Guideline CUL-1E: If a finding of significance for cultural resources has not been made, determine significance prior to undertaking programs for development or rehabilitation of an area to natural conditions. Any plan for restoration, remodeling, adaptive reuse, or non-use should be evaluated using adopted standards such as the Secretary of the Interior's *Standards for the Treatment of Historic Properties* and will require careful consideration to ensure the widest public benefit and greatest protection of the resource, until such time as the more comprehensive CRMP can be completed.
- < Guideline CUL-1F: Establish a program to protect significant cultural resources from adverse effects resulting from Park use, development of facilities, and resource management programs ~~(when determined to be subordinate to the cultural resource)~~.
- < Guideline CUL-1G: Work with groups interested in ethnographic studies and research programs that will address past ways of life of the Sinkyone within the Park. Research topics should address settlement patterns, land management techniques, subsistence technology, trade and exchange, and sociopolitical functions, and the impacts of Euro-American settlement and genocide. Any proposed research should include the opportunity for Native American tribes and tribal organizations to provide input and comments to ensure that no inappropriate infringement of sacred sites or other culturally-sensitive areas occurs as a result of these studies and research programs.
- < Guideline CUL-1H: Provide a buffer for the protection of especially significant Park historic, prehistoric, and archaeological sites or properties of concern to Native Americans by considering the acquisition of

letter 6 attachment

additional land or conservation easements from willing sources. [Work with groups such as the InterTribal Sinkyone Wilderness Council to achieve conservation of these culturally important lands.](#)

- < Guideline CUL-1I: Develop interpretive and educational programs/facilities that educate visitors about the significance of the cultural resources found in the Park and how they can help protect and preserve those resources.

4.5.2 CULTURAL RESOURCES

INTRODUCTION

This section analyzes impacts related to cultural resources that would result from the implementation of the General Plan.

THRESHOLDS

The cultural resources analysis uses criteria from the State CEQA Guidelines Appendix G. According to these criteria, implementation of the General Plan would have a significant impact on cultural resources if it would:

- < Cause a substantial adverse change in the significance of historical resources.
- < Cause a substantial adverse change in the significance of an archaeological resource.
- < Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- < Disturb any human remains, including those interred outside of formal cemeteries.

Environmental Analysis Sinkyone Wilderness State Park
June 2006 4-10 Preliminary General Plan and Draft EIR

Impact

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IMPACT ANALYSIS

Impacts to Cultural Resources. Implementation of the General Plan would result in the avoidance or minimization of disturbances to the integrity of cultural resources situated within the Park. The General Plan includes cultural resources goals and guidelines that ensure the protection and maintenance of prehistoric and historic sites, features, and landscapes documented within the Sinkyone Wilderness SP. This impact is considered less than significant.

A total of 65 prehistoric and historic sites, features, and artifacts have been documented within the Park as a result of various cultural resource investigations. These resources have been identified in the Wilderness and Non-Wilderness areas within Sinkyone Wilderness SP and include early Native American settlements, isolated prehistoric artifacts, and historic-period resources such as homesteads and railroads and traces of early logging and ranching activities. Although much of the Park has never been subjected to an inclusive systematic archaeological inventory, it is apparent that many of the prehistoric and historic sites situated in the Park show that early Native American populations were exploiting the rich and varied floral and faunal resources available in area.

Letter 6 attachment

Although general statements can be made regarding the cultural resources sensitivity of particular landforms within the Park, additional surveys are needed to better define the distribution of sites within the Sinkyone Wilderness SP and ensure that they are not adversely effected by Park development and maintenance proposals. The implementation of Goal CUL-1 and Guidelines CUL-1A through CUL-1H outlined in the General Plan would add considerably to the levels of research and preservation currently occurring within the Park and reduce impacts to a less-than-significant level.

Letter 6 attachment

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Although general statements can be made regarding the cultural resources sensitivity of particular landforms within the Park, additional surveys are needed to better define the distribution of sites within the Sinkyone Wilderness SP and ensure that they are not adversely effected by Park development and maintenance proposals. The implementation of Goal CUL-1 and Guidelines CUL-1A through CUL-1H outlined in the General Plan would add considerably to the levels of research and preservation currently occurring within the Park and reduce impacts to a less-than-significant level.

Letter 6 attachment

Tribal Status of Sally Bell

The *Sinkyone Wilderness State Park Preliminary General Plan and Draft EIR*, in its section on “Ethnographic Setting,” states on page 2-57 that:

Sally Bell, a Wailaki woman interviewed by Kroeber, saw her family massacred at Needle Rock a child. She hid in the woods for several months until she was found by her brother, taken to Philipsville [*sic*] and was subsequently raised by a white family. She had either two or three Indian husbands, and eventually received a 160-acre allotment of land in the Sinkyone region, where she and at least one of her husbands lived (Evans 1987).

The claim that Bell belonged to the Wailaki tribe is in error. It apparently results from a garbling of Evans’s report when her information was summarized in the *Preliminary General Plan and Draft EIR*. Here is what Evans actually said about Bell’s tribal identity:

The ethnography of the Sinkyone culture recorded by Gladys A. Nomland (1935) was collected from three elderly *Sinkyone* consultants in 1928 and 1929. *Sally Bell, Jack Woodman, and Jennie Young were fullblood Sinkyone most probably of the To-cho-be keah or Shelter Cove division* [Emphasis added]....Sally Bell was also interviewed by Kroeber (1902) and Merriam (1976) for Shelter Cove Sinkyone data. On their census applications for the California Indians’ Jurisdictional Act of 1928 (45 Stat 602) Sally Bell and Jack Woodman both responded that they were *Wailaki* (BIA Tribal Operations: personal communication 1987). Powers’ [*sic*] (1976) explanation for this California Indian behavior is especially appropriate for youthful survivors raised by white families, who were particularly fearful of the Wailaki, in isolation from their culture and family. He stated that “If the whites call a certain tribe by a certain name, no matter what, they soon learn to use that, whether speaking to whites or one another” (Powers 1976:115). (Evans, Nancy. Native American History. Coastal Conservancy contract agreement # 86-082:9)

A *close* reading of Evans’s statement shows that she clearly stated that Sally Bell was a “fullblood Sinkyone most probably of the To-cho-be keah or Shelter Cove division” and that while Bell had once indicated that she belonged to the Wailaki tribe, there was an explanation for this inaccurate statement, as provided by Powers. The *Preliminary General Plan and Draft EIR* ignores all of this information, focusing only on the statement that Bell once claimed to be Wailaki, while also incorrectly implying that this information came from Kroeber’s 1902 interview. Evans, incidentally, incorrectly cites the Kroeber information, giving the year of the interview, 1902, rather than the year his “Sinkyone Tales” appeared in the *Journal of American Folk-Lore*, which was 1919 (346-351). In his article, Kroeber refers to Sally Bell as “Mrs. Tom Bell,” and indicates that “her origin, on her mother’s side, [*is*] from Garberville” (346), while referring to the “mythical tales” he was told by George Burt and “Mrs. Tom Bell” as coming from the Sinkyone (346). Kroeber’s field notes for the interviews are not classified by the tribal name Sinkyone and have not yet been located for use in this statement; however, a record from another notebook indicates that on September 28, 1902, he purchased a “salmon line cup & ball” and an “acorn buzzer” for 50¢ at French [Four Corners] from a “South Fork Eel River Athabascan,” which is what he termed Sally Bell at the time (Kroeber, Alfred L. Papers. Microfilm reel 127:433). It may be the latter object that Kroeber later had depicted as part of Figure 15 in his *Handbook of Indians of California* (148).

For its ethnographic coverage the *Preliminary General Plan and Draft EIR* cites only two sources:

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attachment

1. The Evans report, the relevant sections of which come from secondary sources (at least one of which is improperly cited) and which are then inaccurately rendered in the *Preliminary General Plan and Draft EIR*;

2. Kroeber's *Handbook of Indians of California*, which is used to provide a population estimate that is apparently based on secondary information, since it is for the year 1910 and Kroeber's only fieldwork in the area was his brief 1902 visit noted above.

Responsible scholarship, and a proper respect for the Indian peoples described in and affected by the report, would dictate a far more careful and comprehensive study than what was provided by the *Preliminary General Plan and Draft EIR*. At least three ethnographers conducted substantial interviews with Indians generally considered to be Sinkyones, but none of their information was used in the "Ethnographic Setting" section. If these sources were to have been used, the following would have been apparent:

1. Pliny Goddard interviewed Bell on September 30, 1907. She stated that she was "born at Shelter Cove" and that "she talks like the Briceland people," whose village she names "to-ko-bi" (Goddard, Pliny E. Field notes. Boas reel 43).

2. C. Hart Merriam interviewed Sally Bell between August 24 and 26, 1923. He described her as "a full-blood old woman" of the "To-cho-be ke-ah" tribe. In the interview, Bell indicates that this tribe was from Briceland, while a tribe called the "Tahng-i ka-ah" was from Shelter Cove (Merriam, C. Hart. Papers, vol. 1. Microfilm reel 30:422). Merriam explains the discrepancy elsewhere:

The name *To-cho-be-ke-ah* or *Taw-chaw-be keah* means literally the Briceland tribe or band (*To-cho-be* was the name of the Briceland rancheria) but my informants also used the term in a larger sense to include all bands speaking the same dialect from the west side of the South Fork River to the coast....

The four most important bands in this division are the Briceland band (*To-cho-be-keah*); the *Nahns-lin-che keah* just south of Garberville on west side of South Fork River; the Shelter Cove band, *Tang-i-ka-ah*; and the *Yo-sawl* south of the *Tang-i-ka-ah* to Usal Creek and easterly to South Fork River.

The name *Sinkyone* is synonymous [*sic*] with my two divisions the *To-cho-be-keah* and *Lo-lahn-kok* (Merriam, C. Hart. Papers, vol. 1, microfilm reel 9: folder A/1h/G10).

3. Gladys Ayer Nomland also interviewed Sally Bell, stating that "informants used in the field were Sally Bell, Jenny Young, and Jack Woodman....The were all fullblooded Sinkyone..." (Nomland, Gladys Ayer. "Sinkyone Notes." *University of California Publications in American Archaeology and Ethnology* vol. 32 #2 (1935):149).

Other sources also identify Sally Bell as Sinkyone. Malcom Margolin, in *The Way We Lived*, describes the story of the massacre of Bell's family at Needle Rock, listing it as a "Sinkyone" story (162-163) The original version appears in Nomland (166-167).

Bell made no mention of any Wailaki connection in her interviews and specifically claimed affiliation with the To-cho-be keah branch of the Sinkyone group. It is also important to remember that the term Wailaki was known and accepted by government officials, as witnessed by its use in federal census reports, while the term Sinkyone was not. The primitive, inaccurate, and racist classification system found in the 1900 and 1910 special Indian censuses, used such

Letter 6 attachment

tribal names as “Wailaki,” “Mattole,” “Siaz,” “Redwood,” “Coast Range,” and “Digger.” George Burt, for example, who was one of Nomland’s and Kroeber’s Sinkyone informants, is listed on the 1910 census as a “Siaz,” apparently a form of “Siah,” which Merriam describes as the Wiyot and Whilkut “name for ‘way off’ tribe” (Merriam, C. Hart. “Ethnogeographic and Ethnosynonymic Data from Northern California Tribes.” *Contributions to Native California Ethnology from the C. Hart Merriam Collection*. Berkeley: Archaeological Research Facility, 1976:88).

The most accurate assessment of Sally Bell’s tribal status can be made from reviewing the primary information supplied by Bell herself to ethnographers. This information indicates that Bell considered herself to be a To-cho-be keah, a group that is usually subsumed within the Sinkyone tribe but which is never grouped with the Wailakis. Other information, which comes either secondhand from later generations or reflects the categories imposed by the federal government, often proves inaccurate, and should not be relied upon, as was the case with the *Sinkyone Wilderness State Park Preliminary General Plan and Draft EIR*, as the sole factor in determining an Indian person’s tribal status.

Jerry Rohde, M. A.
Ethnographic and Historical Consultant
August 2006

Response to Letter 6 – InterTribal Sinkyone Wilderness Council, Hawk Rosales, Executive Director

- 6A -** The Department acknowledges the suggested text revisions regarding cultural resources provided to us in the letter attachments. Thank you for this information. The majority of these suggestions will be incorporated into the General Plan. Revisions will be made for clarity and accuracy in Section 2.1.6 Cultural Resources (pgs. 2-55 to 2-60 in the Preliminary General Plan/Draft EIR); Section 2.3 Issues Analysis, Cultural Resources (pg. 2-81 in the Preliminary General Plan/Draft EIR); Section 3.2.1 Parkwide Goals and Guidelines, Cultural Resources (pgs. 3-15 to 3-17 in the Preliminary General Plan/Draft EIR); and Section 4.5.2 Cultural Resources (pgs. 4-9 to 4-10 in the Preliminary General Plan/Draft EIR). The specific text revisions are located in Chapter 4 of this Response to Comments document.
- 6B -** An extension of the review and comment period on the Sinkyone Preliminary General Plan/Draft EIR was denied because an extended review period would have made it extremely difficult to schedule the State Park and Recreation Commission hearing this year in Northern California for consideration and adoption of the Sinkyone Wilderness SP General Plan. The Department has complied with the CEQA requirements for public review and comment. The 45-day comment period began on June 23rd and ended August 7, 2006. Copies of the Preliminary General Plan/Draft EIR were made available for review in several locations in Humboldt and Mendocino counties, as well as in Sacramento and from the State Parks Internet web page. The Department has considered all the comments received, and has provided responses to the pertinent CEQA-related issues in finalizing the EIR.

Dear Director of Parks & Recreation,⁸⁻⁵⁻⁰⁶ 7A

I am in full support of the proposed Sinkyone wilderness bill, & especially of the proposed corridor. I believe this is of vital importance for the Sinkyone Wilderness is necessary for the earth & for people to maintain contact & joy in our lives. We have much to learn from the wild. I have grown up & visiting the Sinkyone wilderness & have hiked its entire length more than a few times since I was a young child.

I love the Sinkyone & feel it needs to become fully protected wilderness.

We need your support.
Please do not let us down.

Sincerely,

Megan Aiyana Gregori

<meganaiyana@hotmail.com>

Response to Letter 7 – Megan Aiyana Gregori

- 7A -** The Department appreciates your comments and support for the proposed State Wilderness designation.

DEPARTMENT OF FORESTRY AND FIRE PROTECTION

Resource Management
17501 North Highway 101
Willits, CA 95490
Website: www.fire.ca.gov
(707) 459-7440

Letter 8

August 7, 2006

California State Parks
Northern Service Center
Attn: Dave Keck
One Capitol Mall Suite 500
Sacramento, CA 95814

RECEIVED
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NORTHERN SERVICE CENTER

Project Name: Sinkyone Wilderness State Park General Plan
State Clearinghouse #: 2003022115
Project Applicant: State Of California, Department of Parks and Recreation

The California Dept. of Forestry & Fire Protection (CDF) provides the following input on this project:

1) Forest Pest Issues:

Planners cannot foresee specific forest pest outbreaks, and thus may not have a plan for specific pests, but the Sinkyone Wilderness State Park (State Park) is within Mendocino County, and therefore within the State's (California Department of Food And Agriculture) regulated (quarantined) area for *Phytophthora ramorum*, the cause of sudden oak death. It also lies within two Board of Forestry and Fire Protection declared Zones of Infestation (ZOI): the Coastal Pitch Canker ZOI and the Sudden Oak Death ZOI. There is no mention in the draft General Plan/Environmental Impact Report (GP/EIR) of these pests, or mention of any concerns or management strategies should either introduced pest occur.

The State Park is only a couple townships from active sudden oak death mortality sites near Garberville in SW Humboldt County. Tanoak mortality is increasing in Humboldt Co., and its relevance to this State Park is to the preservation and protection of natural resources, cultural resources, and aesthetic values, as outlined in the draft GP/EIR, which emphasizes the intended protections are:

- Page 3-2. "California State Parks will preserve, protection, restore, interpret and manage the unit's natural, cultural and scenic resources, features, and values, making them available to the public for their educational, inspirational and recreational benefits."
- Page 3-3. This page further revises the above bullet point's Declaration of Purpose for the State Park to "protect, restore, and perpetuate the outstanding natural, cultural and wilderness values ..."

8A

- Page 3-5. "Resource management practices applies in the Park will be tailored to promote, maintain and, when feasible, restore the wilderness character of the Park."
- Page 4-7 lists Douglas-fir-tanoak as a "sensitive natural vegetation community" that is "valuable habitat for plants and wildlife."

The Draft GP/EIR's specific resource management section is 3.2.1, and is found starting on page 3-7. Resource Management is divided into three sections: natural resource management, cultural management, and aesthetics.

Under the first subsection, Natural Resource Management, it states "Allowing natural processes to occur is crucial for the perpetuation of healthy ecosystems at Sinkyone State Park." And where these ecosystems "have been substantially altered or interrupted by human influences, attempts should be made to restore processes to more natural conditions." The human influences affecting or altering the ecosystems does not address the potential for non-human spread of *Phytophthora ramorum* or *Fusarium circinatum*, the cause of pitch canker in pines. Pitch canker is an issue depending upon pine presence in the State Park, particularly native populations of pine.

8B

Also under this subsection are goals and guidelines addressing invasive weeds. The GP/EIR describes Invasive Weeds as potentially degrading to natural plant communities, but does not address invasive pests, especially invasive exotic pests like *Phytophthora ramorum*, which could also be degrading. In fact, a concern of sudden oak death mortality centers is the potential for invasive weed species to occupy the newly disturbed or cleared areas.

Under the Cultural Resources subsection, Guideline CUL-1c promotes the protection and preservation of the prime natural resources ... "Tanoak and bay are cultural resources of Native Americans. These two tree species are capable of becoming infected and spreading *Phytophthora ramorum* to new hosts and extended areas. How will the State Park address protecting these cultural resources, yet allow "natural processes to occur"?

8C

The final subsection deals with Aesthetics and retention of a dynamic landscape. Pest suppression to protect these values is not specifically noted.

8D

For the protection of all Natural Resources, possible alternatives to suppress forest pests capable of significantly altering the natural, cultural, and aesthetic values of the State Park should be considered.

2) Fire Protection issues:

Page 3-26 of Appendix G includes a section entitled "Fire Hazards and Management" and acknowledges the major objective of protecting the State Park and neighboring properties from fire as well as using fire as a management tool for natural succession

8E

and ecosystem renewal processes. As part of this goal the GP/EIR includes four guidelines outlining the objectives.

Guideline FIRE - 1A describes the development of a Wildfire Management Plan (WMP) for the State Park in cooperation with CDF and local volunteer fire departments. The State Park is located on lands designated as State Responsibility Area for wildland fire suppression. The GP/EIR does not include a specific timeline for development and implementation of the WMP. It is important that the WMP be developed and implemented concurrently or soon after the certification of the proposed GP/EIR.

Because of the wilderness status, the GP/EIR should clearly outline permissible suppression activities since an emphasis is placed in the GP/EIR on restricting mechanized equipment and does not clearly outline exceptions such as for fire suppression. Such restrictions will prevent fire fighting ground forces with engines, bulldozers, helitenders, etc. from accessing the park for initial attack suppression activities in the event of a wildfire. The GP/EIR should also address whether fixed wing firefighting aircraft utilizing fire retardant and rotary wing firefighting aircraft are allowable for fire suppression activities on the wilderness portions of the State Park.

8F

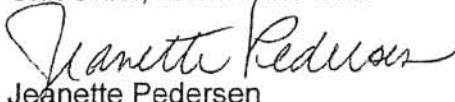
Guideline FIRE-1D describes educating visitors about the importance of fire as an ecological process. The GP/EIR should also educate visitors on risks of wildland fire as well as fire prevention methods to which park users must adhere.

8G

CDF appreciates the opportunity to provide comments on the draft GP/EIR and requests a written response to this letter ten (10) days prior to the final certification of this project's EIR (PRC §21092.5) sent to the above listed address.

If you have questions or need further information please contact Jeanette Pedersen or Jack Marshall, CDF Forest Pathologist at the above address.

MARC ROMERO
Unit Chief, Mendocino Unit

by: 
Jeanette Pedersen
Division Chief, Forest Practice

/j/p

cc: Marc Romero, Unit Chief, CDF Mendocino Unit (MEU)
Bruce Strickler, Deputy Chief, CDF Resource Management, MEU
Jack Marshall, Forest Pathologist, CDF Pest Management
Allen Robertson, CDF Environmental Protection, Sacramento Headquarters
State Clearinghouse

Response to Letter 8 – California Department of Forestry and Fire Protection (CDF), Jeanette Pedersen, Division Chief, Forest Practice

- 8A -** Our Department acknowledges the stated fact that the Sinkyone Wilderness SP is located within the State's regulated area for *Phytophthora ramorum*, the known cause of sudden oak death; also, that the park lies within two Board of Forestry and Fire Protection declared Zones of Infestation (ZOI): the Coastal Pitch Canker ZOI and the Sudden Oak Death ZOI. We will include this reference in the final General Plan, Section 3.2.1, with the following guideline for resource management and coordination with CDF and other jurisdictions:

The new general plan guideline will read as follows:

Guideline NR- 1N: Develop management strategies to reduce and, where possible, eliminate causes and effects of forest pest outbreaks, specifically the occurrence of pitch canker and/or sudden oak death.

- 8B -** Our Department agrees that the spread of forest pests and their effects on resources is a concern for park management. The following text revisions will be made in the final General Plan/EIR:

Section 3.2.1, Subsection: Natural Resources Management

The unique hydrologic and geomorphic processes of the California Coast Range and the influence of the Pacific Ocean have resulted in a mosaic of natural communities providing important habitat for many plant, fish and wildlife species. Allowing natural processes to occur is crucial for the perpetuation of healthy ecosystems at Sinkyone Wilderness SP. Where natural processes have been substantially altered or interrupted by human influences, attempts should be made to restore processes to more natural conditions. Restoration activities should be directed toward self-maintaining levels, where possible. **The non-human spread of forest pests can also significantly affect forest conditions and the health of specific plant species, such as native populations of pine and oaks, necessitating effective management strategies for their control.**

Section 3.2.1, Subsection *Plant Life*

Invasive Weeds

The presence of invasive weeds disrupts natural processes and may degrade natural plant communities, including sensitive riparian areas and other important wildlife habitats that are critical to maintaining naturally functioning ecosystems within Sinkyone Wilderness SP. Proactive control of invasive weeds at Sinkyone Wilderness SP, therefore, is an important component to natural resource management.

Invasive Pests

The presence of invasive pests, especially the invasive exotic pest *Phytophthora ramorum*, the cause of sudden oak death, can also degrade natural plant communities. A concern of sudden oak death mortality is the potential for invasive weed species to occupy the newly disturbed areas.

- 8C -** The parkwide Cultural Resources Management Plan (CRMP), as proposed in Guideline CUL-1C, will address protecting tanoak and bay tree species, which are cultural resources of Native Americans.
- 8D -** The Aesthetic goals and guidelines included in the general plan (section 3.2.1, Aesthetics) will guide the Department in defining characteristics, developing objectives, and working with others to ensure that aesthetic standards and alternatives are identified and implemented in a cooperative Aesthetic Resource Management Plan. Alternatives to suppress forest pests may also be addressed in specific management plans for cultural and natural resources.
- 8E -** General plans prepared for State Park System units do not specify exactly “how” and “when” plan implementation will occur. Implementation of most general plan proposals is subject to available funding and staffing requirements. Management plans called for in the general plan are based on more detailed information and could include priorities or timelines for implementation of program measures. However, a Wildfire Management Plan was prepared for Sinkyone Wilderness State Park and submitted to CDF in 1999. We would like to work with CDF to update that plan as needed, and review specific prescribed burn plans as appropriate.

- 8F -** The Department recognizes the importance of access into designated wilderness for fire suppression activities. State Parks will follow the guidelines and policies in the Department Operations Manual (DOM), Chapter 0300, Natural Resources, pertaining to the management of state wilderness. DOM Section 0304.2.6, State Wilderness, states:

“State Wildernesses shall be protected and managed so as to preserve their natural conditions. There shall be no commercial enterprise and no permanent road within any wilderness area. *Management measures may be taken as necessary for the control of fire, insects, and diseases.*” [Emphasis added].

The authorized use of mechanized equipment in state wilderness areas is described in DOM Section 0304.5.4, Management Use of Mechanized Equipment in State Wilderness, which states:

“Based on wilderness statutes and their intent, and statutes mandating that the Department restore and maintain resources, the use of motorized equipment, motor vehicles or vessels, or other forms of mechanized transport in designated wilderness areas may be considered only when necessary for emergencies involving the health and safety of persons or when the primary management purpose is for necessary natural or cultural resource protection and restoration. In balancing the need to protect solitude and primitive recreation, the following conditions apply to the Department’s use of mechanized equipment, including vehicles, in wilderness areas:

- a. Reasonable alternatives to mechanized equipment do not exist;
- b. A significant resource management need exists, and the result of the work will be substantially unnoticed;
- c. The use of the mechanized equipment is non-recurring, and shall be minimized; and
- d. The District Superintendent shall provide prior written approval, assuring the above requirements will be met.”

- 8G -** The Guideline FIRE-1D will be revised as follows:

Guideline FIRE–1D: Educate visitors about the importance of fire as an ecological process that is essential to the health of the Park’s plant and animal communities. This would include the risks of wildland fire, as well as fire prevention methods.

Letter 9



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AUG 09 2006

NORTHERN SERVICE CENTER

Carole Polasek
Chair, Public Lands Committee
Redwood Unit, Back Country Horsemen of California
PO Box 792
Ferndale, CA 95536-0792
707-786-9637

California State Parks
Northern Service Center
Atten: Dave Keck
One Capitol Mall, Suite 500
Sacramento, CA 95814

Dear Mr. Keck:

Back Country Horsemen of California are committed to the common sense use and enjoyment of California back country and wilderness and the use of recreational pack and saddle stock. Copies of the Mission Statement of Back Country Horsemen of America and the Objectives and Purpose of the Back Country Horsemen of California are enclosed for your information.

9A

The Redwood Unit, Back Country Horsemen of California, does not have any suggested changes or concerns with the proposal for the Sinkyone at the present time.

Thank you for this opportunity to provide input.

We would like to remain on your mailings for all future information concerning the Sinkyone Wilderness State Park.

Sincerely,

A handwritten signature in cursive script that reads "Carole Polasek".

Carole Polasek
Chair, Public Lands Committee
Redwood Unit, Back Country Horsemen of California

Letter 9

Attachment

Mission Statement Back Country Horsemen of America

1. perpetuate the common sense use and enjoyment of horses in America's back country and wilderness
2. work to ensure that public land remains open to recreational stock use
3. assist the various government and private agencies in their maintenance and management of said resources
4. educate, encourage, and solicit active participation in the wise and sustaining use of the back country resources by horsemen and the general public
5. foster and encourage the formation of new state backcountry horsemen organizations

Objectives and Purpose of the Back Country Horsemen of California *from the BCHC Bylaws*

- To improve and promote the use, care and development of California back country trails, campsites, streams and meadows; to advocate good trail manners.
- To promote the conservation and utilization of our back country resources in concert with livestock transportation.
- To keep the back country trails and forage areas open to horsemen on all public lands.
- To keep current information before the Corporation membership and its local Units regarding new legislation or management plans related to government regulations of the back country.
- To support or oppose new proposals, plans and restrictions as related to the interest of horsemen and those persons interested in recreational stock use and enjoying the back country.
- To promote the interest of people who, due to health or physical factors, need transportation other than by foot on back country trails.
- To promote public awareness and interest in the historical aspect of horsemen and stock in the back country and to help educate back country users on ways to use the trail and forage in a manner that conserves the back country resources.
- To assist in keeping the public informed of the vital need for a clean back country.
- To promote a working relationship with and keep the work and interests of the Corporation before our local, state and federal officials.
- To assist in the formation and continuation of local Units to carry out these purposes.

Response to Letter 9 – Redwood Unit, Back Country Horsemen of California,
Carole Polasek, Chair, Public Lands Committee

- 9A -** The Department appreciates your comments and support for the proposed Wilderness and backcountry recreational uses.



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Arcata Field Office
1695 Heindon Road
Arcata, CA 95521
www.ca.blm.gov/arcata



August 11, 2006

In Reply Refer To:
1610 (CA330)P

RECEIVED
AUG 18 2006
NORTHERN SERVICE CENTER

Mr. Dave Keck
California State Parks
Northern Service Center
One Capitol Mall, Suite 500
Sacramento, CA 95814

Dear Mr. Keck:

10A

The Bureau of Land Management (BLM) Arcata Field Office has reviewed the Draft Environmental Impact Report for Sinkyone Wilderness State Park (SWSP). The BLM is pleased to see that the management plan calls for a Wilderness Area along most of the Sinkyone coastline, including lands that adjoin the King Range National Conservation Area (NCA). This land use designation complements the goals of the "Backcountry" management zone of the King Range NCA coastal slope. Together these two areas make up one of the largest segments of undeveloped coastline in the U. S., and both agencies management plans reflect a commitment to protect the primitive values of the "Lost Coast".

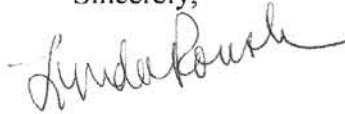
As California State Parks moves forward with the development of specific implementation level plans for SWSP, the BLM would like to be involved in those plans that either affect, or that can be complemented by management of adjoining BLM managed lands in the King Range NCA, Upper Mattole River, and California Coastal National Monument. Specific areas of interest include fire and fuels management, noxious weed management, recreation management. Coordination is especially important in the areas of visitor information, interpretation, and outfitter permitting, as many visitors cross between BLM and State Park lands on the Lost Coast National Recreation Trail.

The BLM appreciates the inclusion of the California Coastal National Monument (CCNM) within the management plan. As a core management partner for the CCNM, California State Parks plays a major role in interpretation and protection of monument resources.

Letter 10

The King Range NCA and SWSP field staffs have a long history of coordination in protecting the resource values of the Lost Coast while providing quality recreation experiences. We look forward to this continued relationship. If you have any questions, please contact Bob Wick of my staff at (707)825-2321.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lynda Roush".

Lynda Roush
Arcata Field manager

cc: Mr. Roger Goddard
California State Parks
North Coast Redwoods District
P. O. Box 2006
Eureka, CA 95502

Response to Letter 10 – Bureau of Land Management, Lynda Roush, Arcata Field Manager

- 10A** - The Department appreciates your comments and support for the proposed State Wilderness designation along the Sinkyone coastline. At the time that specific management plans are prepared, our Department will contact the BLM Arcata Field Office to coordinate resource and recreation management programs and provisions for visitor access between State Park lands, the King Range NCA, and the Lost Coast National Recreation Trail.

4 RECOMMENDED CHANGES TO THE GENERAL PLAN

This chapter contains recommended revisions to the Preliminary General Plan/Draft EIR for Sinkyone Wilderness State Park made subsequent to its public release and the public review process. All revisions are a result of responses to comments detailed in Chapter 3. Text revisions are organized by the page numbers that appear in the Preliminary General Plan/Draft EIR. The Final General Plan/EIR may include additional minor revisions in order to ensure accuracy of information presented in the plan.

Page 2-2, Parkwide Land Uses, will be revised to read:

The Hotel Gulch trail is available for horses from Usal Beach Campground to Wheeler. ~~Some trail camps are available along the trail.~~

Page 2-8, Local and Regional Residents, will be revised to read:

The local and regional residents constitute a **large** portion of Park visitors ~~(40% annually)~~. In addition, local schools and the California Conservation Corps (CCC) use the Park for educational opportunities and also provide help to park maintenance staff in the form of manual labor (e.g., manual vegetation removal). ~~Local schools and the CCC account for approximately 20% of the Park visitors. Another 20% of Park visitors are Bay Area residents. The remaining percentage is a combination of Other visitors to the Park include~~ California residents from other regions, including the Bay Area, as well as out-of-state and international visitors.

Page 2-10, Meteorology, will be revised to read:

Sunny days occur along the coast on an average of 55% of the time over the course of a year, fluctuating from 45% in the winter to 65% during the rest of the year. The same amount of sunshine reaches inland, however in the summer it can increase up to 80% inland. Fog reaches its maximum during July and August on the coast, where ~~it coastal fog can be~~ is usually present ~~15-18% of the time~~ days of the month.

Page 2-54, Other Forest-associated Species, will be revised to read:

Roosevelt elk were introduced into the Kings Range and are known from the Park since the 1980s~~reintroduced into the Park in 1982~~. Historically, elk inhabited moist forests and coastal areas from San Francisco Bay north to Vancouver Island, but populations were extirpated by over-hunting.

Page 2-55, Cultural Resources, will be revised to read:

NATURAL HISTORY

The topography, coastal setting, presence of numerous perennial and seasonal water sources, wide range of floral and faunal species and other natural resources made this region a prime location for human indigenous peoples' habitation and economic pursuits over thousands of years. The region's history is rich in cultural heritage and land stewardship. Aactivity associated with tanbark processing, shipping, logging, grazing and recreational industries is associated with the arrival of the area's non-native settlers.

PREHISTORIC SETTING

Archaeologists identify ~~T~~the Paleo-Indian Period (10000 B.C. to 6000 B.C.) saw as being the first demonstrated entry and spread of humans into California with most known sites being situated along lakeshores. Characteristic artifacts noted in the lithic assemblages include fluted projectile points and flaked crescents. ~~Numerous occurrences~~ Examples of this ~~P~~pattern's distinctive artifacts are reported and can be affiliated with documented assemblages in California and throughout North America. However, it is important to note that many North American Indian peoples do not subscribe to the theory that they migrated to those areas that are considered to be their historic territories. Rather, most Indian tribal histories assert that its peoples were created within their lands.

The beginning of Lower Archaic Period (6000 B.C. to 3000 B.C.) coincides with the middle Holocene climatic shift to more arid conditions that brought about the drying up of the pluvial lakes. Indigenous peoples' ~~s~~Subsistence appears to have been focused more on plant foods although hunting clearly still provided important food and raw material sources. Settlement appeared to be semi-sedentary with little

Page 2-56, Cultural Resources, will be revised to read:

emphasis on material wealth. ~~Distinctive artifact types include large projectile points, milling slabs and handstones.~~

The Middle Archaic Period (3000 B.C. to 1000 B.C.) starts at the end of mid-Holocene climatic conditions when weather patterns became similar to present-day conditions. Discernable cultural change was likely brought about in response to these changes in climate and accompanying variation in available floral and faunal resources. Economic systems were more diversified and likely included ~~the introduction of acorn~~ various food processing technologies. Hunting remained an important source of food and raw materials although reliance on plant foods appears to have

dominated the subsistence system. ~~Typologically and technologically important artifacts characteristic of this period include the bowl mortar and pestle and the continued use of large projectile points.~~

A marked expansion of sociopolitical complexity marks the Upper Archaic Period (1000 B.C. to A.D. 500), with the development of status distinctions based upon material wealth. Shell beads gained in significance as possible indicators of personal status and as important trade items. ~~This period retained the large projectile points in different forms, but the milling stone and handstone were replaced throughout most of California by the bowl mortar and pestle.~~

The Emergent Period (A.D. 500 to 1800) is distinguished by the advent of several social and technological ~~and social~~ changes, such as the bow and arrow. ~~The bow and arrow were introduced, ultimately replacing the atlatl.~~ Territorial boundaries between groups became well established and ~~were~~ have been documented in early historic accounts.

~~Cultural traits that distinguish this pattern include pre-interment grave-pit burning, tightly flexed burials and cremation. Artifact assemblages include Dentalium shells, bone and antler harpoons, adzes, wedges and mauls, net sinkers, Haliotis ornaments, mortars and pestles (Moratto 1984).~~

ETHNOGRAPHIC SETTING

The area from the northern Mendocino coast to southern Humboldt was occupied by a group of five tribelets collectively called referred to by ethnologists as the Sinkyone. These five groups spoke related Athabascan dialects and shared cultural similarities (Evans 1987). ~~Numerous villages were recorded by Baumhoff (Evans 1987) though only one, Usal, was noted as being on the coast. Estimates of pPre-contact populations~~ estimates range from 740–4,000 individuals, based on various formulae, however Kroeber (1925) estimated that only approximately 200 remained by 1910.

Sinkyone ~~villages were~~ habitation was mainly located largely inland and in some instances along the coast, along rivers and drainages. ~~These would have been used primarily during winter. In the other months, family~~ Seasonally, groups would go to the hills to hunt or gather plant foods or to the coast to

Page 2-57, Cultural Resources, will be revised to read:

collect shellfish, fish, sea mammals, waterfowl or seaweed (Evans 1987). Seasonal salmon runs were especially important as a source of winter food.

Other products collected by the Sinkyone included iris, spruce, fern, hazel and redwood fibers for basketry or rope, skins for blankets or clothing, wood and horn for chisels, ~~obsidian traded from distant locations~~, redwood for building slabs, madrone bark for structures, and shells s for beads. Obsidian was traded from distant locations.

The “Indian Wars” of Humboldt and Mendocino (1860–1865) were spurred by the increasing American population in the area following California’s admittance to the Union. In 1850, the California legislature passed laws making it possible to force Indians into labor and to bind their children over to white citizens. These acts were met with some resistance, including a range of events from theft to murder. ~~A number of Many~~ Indian families and tribal groups were massacred during these times.

One such event has become notorious locally. Sally Bell, a ~~Wailaki Shelter Cove Sinkyone~~ woman ~~interviewed by Kroeber~~, saw her family massacred at near Needle Rock as a child. She hid in the woods ~~for several months until she was found by her brother, taken to Philippsville,~~ and was subsequently raised by a white family. She ~~had either two or three Indian husbands, and~~ eventually received a 160-acre allotment of land in the Sinkyone region, where she ~~and at least one of her husbands and her family~~ lived (Evans 1987).

HISTORIC SETTING

The first European settlers known in the project area were Archibald Hamilton and William Oliver, who claimed land in Shelter Cove in the 1850s (Roscoe 2002). Oliver was subsequently killed by Indians whom ~~they~~ he had accused of stealing cattle. Hamilton then left the area, which was next homesteaded by the three Ray brothers, who ~~married Indian women and~~ settled at Shelter Cove Ranch.

Settlers began occupying land around Bear Harbor in the 1860s, using the land for cattle and sheep grazing. Until then, the only paths-in routes leading into and through the area were Indian trails ~~which generally followed ridgelines in from the coast~~. The European settlers built the Humboldt Trail in 1862, which went to Eureka. Another trail was built from the Eel River valley to Bear Harbor in 1865. New settlers, including the Kaiser brothers, added to the industry in Bear Harbor. Ranching, logging and tanbark operations expanded. Surf landing spots for shipping soon gave way to wharfs and wire chutes (Roscoe 2002). By 1890, a railroad had been constructed to run between the coast at Bear Harbor and J.B. Stetson’s sawmill, 3 miles inland.

Bear Harbor continued to grow as a port, with concomitant expansion of the wharf and railroad line, as well as local ranches, timber shipping ports and other

Page 2-58, Cultural Resources, will be revised to read:

businesses, residences, and a school. Damage from the 1906 earthquake started the decline of the local industry. The local school closed in 1908 because of lack of work (and presumably people) in the area. The town of Needle Rock likewise enjoyed a lumber boom, then bust (Roscoe 2002), and later converted to ranching. Needle Rock Ranch included two residences, bunkhouses, other outbuildings, and a railway (DPR 1988).

Northport (Anderson Landing) began as a shipping point developed by Robert Anderson in the 1870s using a wire chute (Roscoe 2002). Wheeler, located in the old Northport area, was one of the last logging company towns established in California. Sawmill operations there commenced in 1948 and had shut down by 1959.

Usal began as a ranching area, but lumber interests had moved into the area by 1888 (Roscoe 2002). A small town, population approximately 160, grew to support the business. There were approximately 40 buildings, a wharf, and sawmill.

The towns of Needle Rock, Bear Harbor, Wheeler, Northport, and Usal ~~Bear Harbor, Usal, Wheeler, Northport and Needle Rock~~ all supported working communities, however successive waves of industry recycled or removed construction from the previous one, leaving little surface evidence of these activities today (Resource Protection Division 1988).

Background Research

Background research began with an interview with National Park Service archaeologist Karin Anderson, who provided an overview of archaeological efforts in Sinkyone Wilderness SP. Documents regarding archaeology, historic documentation, and copies of State Parks site record forms for most of the resources within the Park were obtained from the State Parks North Coast Redwood District Office in Eureka.

An information request was submitted to the North Coast Information Center (NCIC), for the project area as a whole. The purpose of the NCIC search was to determine whether there were previously recorded historic resources or if archaeological surveys had been performed within or in the vicinity of the project area. The NCIC had records of almost 20 archaeological surveys that had been conducted within the project area (Appendix E, not publicly available). Site record forms pertaining to resources identified during those surveys are on file with Sinkyone Wilderness SP ~~the State Parks North Coast Redwood District Office. Archaeological surveys within the Park have focused on the interior sections of the Park, rather than the coastal strand.~~

Page 2-59, Cultural Resources, will be revised to read:

Archaeology of the Project Area

Formal archaeology in the Park vicinity began in the late 1970s. Archaeological surveys have been conducted in relation to prehistoric resources, logging operations, road repair, and slope restoration, as well as other projects.

~~Prehistoric and historic use of the project area appears to be well understood. Historic maps and deeds round out the historic picture.~~

Cultural resources within Sinkyone Wilderness SP have been subjected to a number of impacts, including theft, that have caused damage or total destruction. Chiefly, past logging activities have resulted in widespread damage and destruction of cultural resources. ChieflyAlso, erosion of various types (coastal, stream, alluvial) has washed away site components. Other factors, such as removal, destruction or recycling of structures in the historic lumber towns and mill areas have left little surface evidence of the large-scale exploitation of lumber in the 19th and 20th centuries in the project area. Foot or equestrian traffic, looting, construction or maintenance of Park facilities, and road removal or re-contouring has caused cumulative damage to some sites. In spite of the imposing terrain of the project area, it clearly has been the focus of significant prehistoric and historic development. The potential for retrieving important data from known and as-yet undiscovered resources is significant.

Native American Interests

The InterTribal Sinkyone Wilderness Council (Council) was formed in 1986 to address local Indian ~~tribe~~ tribal concerns in the Sinkyone region. The Council consists of ten (10)⁴⁴ federally recognized tribes whose memberships include descendants of original Sinkyone Indian families. The Council's goals include the preservation, protection, and restoration of cultural-natural resources and the reinstatement of local Indian peoples' traditional values and land uses in the Sinkyone region. The Council owns lands located adjacent to and east of the Sinkyone Wilderness SP. The Council developed and executed conservation easements to protect in perpetuity the cultural and natural resources within the InterTribal Sinkyone Wilderness. The Council administers projects in cultural resource protection, land management planning, reforestationforest stewardship, salmon stream restoration, and watershed rehabilitation. The Council emphasizes traditional cultural uses by local tribal members, resource restoration and stewardship, and ecology education. InterTribal Sinkyone Wilderness Council priority projects include: (1) development of limited public access low-impact InterTribal campgrounds and trails that will link directly to the Lost Coast Trail in the Sinkyone Wilderness State

~~within the Park, which traverses the longest stretch of coastal wilderness in the lower 48 states; (2) continued salmonid habitat restoration work at Wolf Creek (Jackass Creek) and other Sinkyone streams; (3) planning for Tribal Heavy Equipment Operator Training Project 2004–05 for the Sinkyone Wilderness SP Watershed Rehabilitation-Roads Removal Program on the Council's InterTribal land; (4) development of a Forest Management Plan and an Integrated Resource Management Plan to guide the InterTribal Parks~~

Page 2-60, Cultural Resources, will be revised to read:

~~possessive long-term stewardship advocacy during the timber harvest plan process for protection of Sinkyone cultural resources on neighboring industrial timberlands; and 5) resource management~~ partnership projects with California State Parks in the adjacent Sinkyone Wilderness SP (Trees Foundation 2003).

The Council has formally commented during the entire planning process to express theirits concerns and ideas for the General Plan/ Environmental Impact Report. Among the topics brought for discussion were protection of cultural resources in cooperation with the Council and other stakeholders, cooperative management of Park resources, watershed restoration, road to trail conversions, and maximum wilderness designation.

Page 2-63, Recreational Facilities, will be revised to read:

Briceland Road (County Road 435) runs parallel to the coast within the Park starting at Four Corners and ending at Orchard Camp. The road is narrow, and subject to washouts, and The section of road from Needle Rock to Orchard Camp is closed during the rainy season.

Page 2-64, Recreation Facilities, Table 2-5, will be revised as follows:

Table 2-5 Existing Recreation Facilities in Sinkyone Wilderness State Park		
Facility Description	Total	
	# Sites	Visitor Capacity
Family Camping Facilities		
Primitive/undeveloped (up to 8 people and two vehicles, tent space, stove, table, and nearby piped water, chemical or vault toilet)	52	416
Developed	0	0
RV Hookup	0	0
Trail Campsite	12	96
Hike-in or Bike Campsite	0	0

Page 2-67, Buildings, will be revised to read:

Sinkyone Wilderness SP includes 14 buildings that are located throughout the Park and 21 vault toilets. The most well known and most often used buildings are the Needle Rock Visitor Center and the old barn house, both located on the north end of the Park on Briceland Road. Needle Rock was a small settlement that was well established in by the early 1900s ~~1920s~~ as a shipping point and dairy operation. The Needle Rock Visitor Center was the home of the Calvin Cooper Stewart family that settled at Needle Rock.

Page 2-69, Parking, will be revised to read:

Limited parking is available in the Park. Several parking places are available at the Needle Rock Visitor Center and ~~approximately 5 are available~~ at Orchard Camp. At the southern end of the Park, Usal Beach Campground and Usal Beach also provide parking areas.

Page 2-81, Issues Analysis, Cultural Resources, will be revised to read:

Culturally significant areas within the Park were identified as part of the planning process and the General Plan/ Environmental Impact Report aims to protect these resources and includes coordination with authorized Native American stakeholder tribal representatives to identify and preserve the important Native American sites. Protection and management of significant resources are important issues addressed in the General Plan/ Environmental Impact Report.

Page 3-7, Natural Resources Management, will be revised to read:

The unique hydrologic and geomorphic processes of the California Coast Range and the influence of the Pacific Ocean have resulted in a mosaic of natural communities providing important habitat for many plant, fish and wildlife species. Allowing natural processes to occur is crucial for the perpetuation of healthy ecosystems at Sinkyone Wilderness SP. Where natural processes have been substantially altered or interrupted by human influences, attempts should be made to restore processes to more natural conditions. Restoration activities should be directed toward self-maintaining levels, where possible. The non-human spread of forest pests can also significantly affect forest conditions and the health of specific plant species, such as native populations of pine and oaks, necessitating effective management strategies for their control.

Page 3-8, Natural Resource Management, Plant Life, will be revised as follows:

Invasive Weeds

The presence of invasive weeds disrupts natural processes and may degrade natural plant communities, including sensitive riparian areas and other important wildlife habitats that are critical to maintaining naturally functioning ecosystems within Sinkyone Wilderness SP. Proactive control of invasive weeds at Sinkyone Wilderness SP, therefore, is an important component to natural resource management.

Invasive Pests

The presence of invasive pests, especially the invasive exotic pest *Phytophthora ramorum*, the cause of sudden oak death, can also degrade natural plant communities. A concern of sudden oak death mortality is the potential for invasive weed species to occupy the newly disturbed areas.

Page 3-12, Natural Resources Management, Plant Life, a guideline will be added:

Guideline NR – 1N: Develop management strategies to reduce and, where possible, eliminate causes and effects of forest pest outbreaks, specifically the occurrence of pitch canker and/or sudden oak death.

Page 3-15, Cultural Resources, will be revised to read:

- < Guideline CUL-1A: Develop an inventory, GIS mapping system, and database for those cultural resources within the Park that may be eligible for inclusion in the National Register of Historic Places and/or the California Register of Historic Resources. Confidentiality of this database will conform to Government Code 6254 “Restriction of Archaeological Record Disclosure” and 6254.10 “Information Maintained by Department of Parks and Recreation.”
- < Guideline CUL-1B: Consult regularly with local Native American people and groupstribes and tribal organizations who have traditional ties to resources within the Park to ensure productive, collaborative working relationships, especially when considering management practices, such as the Department’s gathering policy, and interpretation involving the Park’s natural and cultural resources of interest and concern to them.

Page 3-16, Cultural Resources, will be revised to read:

- < Guideline CUL-1E: If a finding of significance for cultural resources has not been made, determine significance prior to undertaking programs for development or rehabilitation of an area to natural conditions. Any plan for restoration, remodeling, adaptive reuse, or non-use should be evaluated using adopted standards such as the Secretary of the Interior’s

Standards for the Treatment of Historic Properties and will require careful consideration to ensure ~~the widest~~ public benefit and resource protection, until such time as the more comprehensive CRMP can be completed.

- < Guideline CUL-1F: Establish a program to protect significant cultural resources from adverse effects resulting from Park use, development of facilities, and resource management programs ~~(when determined to be subordinate to the cultural resource)~~.
- < Guideline CUL-1G: Work with groups interested in ethnographic studies and research programs that will address past ways of life of the Sinkyone within the Park. Research topics should address settlement patterns, land management techniques, subsistence technology, trade and exchange, and sociopolitical functions. No inappropriate infringement of sacred sites or other culturally-sensitive areas should occur as a result of these studies and research programs.
- < Guideline CUL-1H: Provide a buffer for the protection of especially significant Park historic, prehistoric, and archaeological sites or properties of concern to Native Americans by considering the acquisition of additional land or conservation easements from willing sources. Work with groups such as the InterTribal Sinkyone Wilderness Council to achieve conservation of these culturally important lands.

Page 3-27, Fire Hazards and Management, the guideline will be revised as follows:

Guideline FIRE-1D: Educate visitors about the importance of fire as an ecological process that is essential to the health of the Park's plant and animal communities. This would include the risks of wildland fire, as well as fire prevention methods.

Page 3-27, Roads and Trails, the guideline will be revised as follows:

Guideline RT-1C: Evaluate the Park's entire roads and trails system and prepare a Roads and Trails Management Plan with guidelines for the management of existing roads and trails. This management plan should guide the placement and use of any future roads, trails, and trail camps, and evaluate opportunities for non-motorized transportation for the elderly and disabled persons. Work with Mendocino County to evaluate options to transfer ownership of Briceland Road from Four Corners to Bear Harbor to State Parks.

Page 3-28, Roads and Trails, a guideline will be added:

Guideline RT – 1F: Provide universal access to all park facilities, such as buildings, trails, campsites, and picnic sites and their contents, parking.

and routes of travel where feasible (see reference to accessibility guidelines in section 2.2, Planning Influences).

Page 4-10, Cultural Resources, Impact Analysis will be revised to read:

A total of 65 prehistoric and historic sites, features, and artifacts have been documented within the Park as a result of various cultural resource investigations. These resources have been identified in the Wilderness and Non-Wilderness areas within Sinkyone Wilderness SP and include early Native American settlements, isolated prehistoric artifacts, and historic-period resources such as homesteads and railroads and traces of early logging and ranching activities. Although much of the Park has never been subjected to an inclusive systematic archaeological inventory, it is apparent that many of the prehistoric and historic sites situated in the Park show that early Native American populations were ~~exploiting~~ utilizing the rich and varied floral and faunal resources available in area.

Page 4-18, Hazards and Hazardous Materials, will be revised as follows:

Implementation of the General Plan would not result in a substantial increase in the use of hazardous materials (e.g. propane) within the Park. Day-to-day operation of the Park does not involve the transport or disposal of hazardous materials, and the Park would continue to contract with licensed providers of propane. The Department recently installed a solar system at the Needle Rock House, which ~~significantly reduced dependence upon the use of~~ propane, ~~thereby and may reduceing~~ the need to transport propane into the Park. All use of hazardous materials, as well as the development of new storage tanks or areas, would be in compliance with state and federal laws and regulations. Furthermore, the Park is not located within one-quarter mile of a school or airport.